DEPARTMENT OF TOXIC SUBSTANCES CONTROL

1011 N. GRANDVIEW AVENUE GLENDALE, CA 91201 (818) 551-2800

May 26, 1995



Louis D. Van Mullem, Col, USAF Department of the Air Force 30 SPW/ET 806 13th Street, Suite J Vandenberg AFB, CA 93437

Dear Col. Van Mullem:

On April 19-21, 1995, the California Environmental Protection Agency, Department of Toxic Substances Control (Department), conducted an inspection of Vandenberg Air Force Base. The enclosed report describes the findings of this inspection, including all violations and any actions that should be taken by the facility to correct the violations.

If violations were found, you are required by section 25185(c)(3) of the Health and Safety Code to submit a written response to the Department within 30 days describing the corrective actions that you have taken or propose to take to bring your facility into compliance. If you dispute any of the violations, you should explain your disagreement in this written response. The issuance of this letter does not preclude the Department from taking administrative, civil, or criminal action as a result of the violations noted in the report.

All pertinent information derived from the inspection, including documents, photographs, and sampling results, are included as attachments to the report, except copies of documents provided by your facility at the time of the inspection. In order to reduce copying and mailing costs, these have not been returned to you with the report; copies will be provided if you request them. This report will become a public document; you may request that any trade secret or facility security information be withheld from public disclosure. (See Health and Safety Code Section 25173)

If you have any questions regarding this letter, or if you wish to meet with the Department to discuss any questions or concerns you have with the inspection, the report, the violations, or the proposed corrective action, please call Larry Stuck at (818) 551-2930.

Sincerely,

Robert Kou

Veur Rr

Supervising Hazardous Substances Scientist

Statewide Compliance Division

Enclosure

COMPLIANCE EVALUATION INSPECTION REPORT

VANDENBERG AIR FORCE BASE
30 SPW/ET
806 13th Street, Suite J
California, 93437-6021
(805) 734-8232 ext. 6-1921

EPA ID # CA 9570025149

Inspected By: Larry Stuck
Date Inspected: April 19 - 21, 1995
Report By: Larry Stuck
Date of Report: May 26, 1995

I. Purpose:

To conduct a Compliance Evaluation Inspection (CEI) of Vandenberg Air Force Base (VAFB) which has a State Hazardous Waste Facility Permit and RCRA ISD for storage and has applied for a RCRA TSDF permit to treat and store hazardous waste. As part of this CEI, units authorized or exempt under tiered permitting were also inspected.

II. Representatives Present:

Vandenberg Air Force Base (VAFB):

Louis Van Mullem, Colonel
John Gunderson, Legal Counsel
Duane Wolfe, Environmental Manager
Joe Naputi, Master Sergeant
Jon Erickson, Environmental Engineer
Benny Romero, Environmental Protection Specialist
John Sipos, (Jacobs Engineering) Environmental Manager

California Environmental Protection Agency / Department of Toxic Substances Control (Department):

Larry Stuck, Hazardous Substances Scientist Carlos Ortega, Hazardous Substances Scientist

United States Environmental Protection Agency (EPA):

Diane Bodine, Compliance & Enforcement Officer

III. Owner/Operator:

This facility is legally owned by the Department of the Air Force and is operated by the Defense Logistics Agency. Many of the units are operated or cooperated by civilian contractors and consultants. VAFB assumes the role of generator and ISD facility for all activities on the base whether or not military personnel are directly involved. Currently, Jacobs Engineering Group, Inc. is the consultant hired to help with all Permit requirements and to operate many units.

IV. Background:

December 18, 1981 The Department issued an Interim Status Document (ISD) to VAFB.

April 25, 1985 Department inspector, Maxine Richey performed a record review at VAFB to determine

	compliance.
August 15, 1985	Department inspector, Maxine Richey performed a "walk through" inspection of VAFB.
June 5, 1986	Department permit writer, Carmelita Lampino performed a "pre-permit" inspection of VAFB.
June 25, 1986	Jacobs Engineering Inc. conducted a Compliance Evaluation Inspection under contract with the Environmental Protection Agency (EPA).
July 24, 1986	The Department issued a State Hazardous Waste Facility Permit to VAFB.
May 26, 1988	Jacobs Engineering Group, Inc. conducted a Compliance Evaluation Inspection under contract with the EPA.
October 24, 1990	Department inspector, Larry Stuck conducted a CEI inspection.
January 9, 1991	The Department issued a Report of Violation and Schedule of Compliance citing 12 counts.
August 5, 1991	The Department sent VAFB a letter authorizing them to continue operating according to conditions defined in their Hazardous Waste Facility Permit issued on July 24, 1986, until their new Part A and B permit application is reviewed by the Department.
October 29, 1991	Department inspector, Larry Stuck conducted a CEI inspection.
January 16, 1992	The Department issued a Report of Violation and Schedule of Compliance citing 5 counts.
December 17, 1992	VAFB submitted a revised Part A application for five treatment and storage units.
December 22, 1992	Department inspector, Larry Stuck conducted a CEI inspection and cited four violations.
April 1, 1993	VAFB submitted initial notification of units operating under tiered permitting requirements.

May 10, 1993 VAFB submitted a revised Part B application.

May 26, 1993 The Department accepted VAFB's Parts A and B as administratively complete.

May 27, 1993 The Department issued a Report of Violation (ROV) and Schedule of Compliance citing 4 counts.

September 24, 1993 VAFB submitted a revised notification for units qualifying for tiered permitting.

March 14, 1994 The Department issued a Desk Order to VAFB citing the 4 counts included in the May 27, 1993 ROV.

March 23, 1994 The Department granted authorization for 18 tiered permitting units including 3 conditionally exempt treatment units and 15 conditionally authorized treatment units.

June 22 & 23, 1994 Department inspector, Larry Stuck conducted a CEI inspection. There were no violations cited.

January 19, 1995 VAFB submitted a revised Part A application (see Attachment 1).

January, 1995 VAFB submitted a revised Part B application.

V. <u>Hazardous Waste Permit Status</u>:

VAFB is operating a hazardous waste storage facility under a RCRA ISD as well as a State Hazardous Waste Facility Permit. VAFB also operates an open burn/open detonation (OB/OD) pit under a RCRA ISD.

Activities operating at VAFB which were noted in their January 19, 1995 RCRA Part A application include:

- Explosive ordinance disposal (EOD) an OB/OD unit requiring a RCRA Permit.
- 2) Ultra-violet (UV)/Ozone wastewater treatment which will require a RCRA Permit to treat hazardous level wastewater.
- 3) Hazardous waste storage facility requiring a RCRA Permit.
- note: 1) Bulb crusher requiring a RCRA Permit. VAFB has removed this unit from their application and from service and has contracted Mercury Recovery Services to pick-up intact bulbs for recycling. This unit is going through closure.
 2) Acid/Base neutralization requiring a RCRA Permit. VAFB

has removed this unit from their application. This neutralization unit was proposed but never installed at VAFB.

Other hazardous waste activities include on-site recycling of Freon and lacquer thinner which are exempt since they reuse these materials on-site, and silver & copper reclaiming and oil/water separation, both of which fall under tiered permitting requirements.

VAFB has consolidated several of 18 hazardous waste collection accumulation points (CAPs), which were operated as generator units with storage less than 90 days, into one "super CAP". CAPs remain at the hypergolic fuel stockpile locations for safety reasons.

VAFB has Air Pollution Control District (APCD) permits for two air scrubber units at the Hypergolic Storage Stockpile Facility (HSSF) and oxidizer storage facility and Water Quality Control Board permits for wastewater treatment units and two evaporation ponds.

VI. General Description of Facility:

VAFB is located along 35 miles of Santa Barbara County coast, approximately 55 miles northwest of Santa Barbara. VAFB is currently the third largest United States Air Force (USAF) installation, covering more than 98,400 acres or 154 square miles. The base is bordered by the Pacific Ocean to the west and south, by Casmalia Hills to the north and six miles to the east is the city of Lompoc (see Attachment 2).

VAFB hosts more than 40 Department of Defense (DOD) and non-DOD government organizations and 75 civilian aerospace contractors, employing a total of nearly 15,000 people. VAFB remains the generator for all hazardous wastes generated on the base and is responsible for all environmental permits.

The base was first established in 1941 as a training center for armored and infantry divisions of the army and was designated Camp Cooke. In June 1957, Camp Cooke was transferred to the USAF to become USAF's first missile base. In 1958, the base was redesignated VAFB. In December 1958, VAFB launched its first missile and has launched more than 1,638 missiles and space boosters to date. VAFB's primary mission is to conduct strategic air command (SAC) missile combat crew training, operational testing and other intercontinental ballistic missile and space-related programs.

VII. <u>Hazardous Waste Activity</u>:

VAFB stores hazardous waste in a secure storage building which is covered by a RCRA ISD and a State Permit. This storage building has a maximum storage capacity of eight hundred and thirty-two 55 gallon drums. VAFB also temporarily stores hazardous waste up to 90 days in a consolidated "super CAP" or in a few remaining CAPs. Except for a few wastestreams, all wastes from the CAPs are sent to the RCRA ISD storage facility prior to shipping to an authorized treatment or disposal facility. VAFB generates and stores annually approximately 130,000 pounds (lbs.) of spent halogenated solvents, 22,000 lbs. of spent non-halogenated solvents, 1,030 lbs. of spent cyanide, 155,000 lbs. of corrosive wastes, 450,000 lbs. of ignitable wastes, 61,000 lbs. of polychlorinated biphenyl (PCB) wastes, and metal wastes including 17,000 lbs. of chromium, 150 lbs. of arsenic, 115,000 lbs. of lead and 3000 lbs. of silver according to Table I-2 of VAFB's 1995 Part B RCRA Permit These wastes are generated as a result of missile Application. maintenance and operations, lubricating oil change, processing, paint stripping, cleaning, and metal finishing and plating operations.

VIII. Observations:

On April 19, 1995 at approximately 0800 hours, Department inspectors Ortega and I arrived at VAFB's Environmental Management Office. We held a brief introduction and opening meeting with VAFB's Base Commander and Environmental officers, discussing the purpose of the visit and what we needed to see and do. I explained that this inspection would be basically the same as the previous years' inspections. I asked for consent to proceed with the inspection which was granted.

We caravaned to the AVS photo processing laboratory to inspect the We met with Jack Armstrong and Col. silver recovery unit. McAlister who led us into the basement and showed us the silver recovery unit. This system has been moved to a small room where the unit was originally located. VAFB is still hooking up the plumbing to this unit. There were steel wool canisters in series which are labeled as hazardous waste after they are removed from the system. The wastewater empties into a tank, with a plastic lid where the flow is measured. From the tank, the water is pumped into a 55-gallon drum which is sampled and labeled awaiting The contractor stated that this wastewater is nonhazardous approximately 90% of the time with levels of silver below He stated there is a one to three week turnaround time for There were approximately eight drums of the sample results. wastewater stored outside of the room. Some were labeled as awaiting analysis. The steelwool canisters that were in the dark rooms have been removed and the waste is plumbed directly downstairs to the recovery unit.

We then drove to the new Hazmart Warehouse, where all hazardous products are managed and stored on the base. VAFB uses a "pharmacy" system whereby materials must be ordered by base Hazmart personnel then personnel or contractors from Hazmart. check out the requested amount of materials. All materials are Within two weeks all unused bar-coded and tracked by Hazmart. materials must be returned to Hazmart. VAFB stated that this system will cut down on improper management of hazardous materials and wastes and will cut down on disposal costs of out-dated retrograde materials stored at various generator locations. back of the warehouse there are steel sheds where flammable materials and hazardous wastes, off-spec or expired shelf life materials, are stored.

We next went to the base hospital to inspect the x-ray machine's silver recovery unit which is conditionally exempt under tiered permitting. This unit was similar in operation to the unit at the AVS Laboratory but on a much smaller scale. Sergeant Fraser stated that one 15-gallon drum is filled and sent to the super CAP each week. This system lowers the silver content in the fixer solution from approximately 4500 ppm down to approximately 300 ppm. The treated fixer solution is sent off-site as hazardous waste.

We drove to the newly built "super CAP" where approximately 16 former CAPs have been consolidated. There were two large bays which were subdivided with containment berms. All of the required safety equipment was present. Outside of the south bay, there were two steel storage sheds. One had several containers that had just recently been received from satellite accumulation areas or from the household hazardous waste collection program. There were two 5-gallon containers which did not have hazardous waste labels. These containers were marked awaiting analysis. One container contained rifle bore cleaning solvent and the other contained waste oil. Since VAFB normally manages these wastes as hazardous wastes, I asked VAFB to label these containers immediately and the analyses can confirm the constituents. VAFB labeled the containers while we were there. There were several containers containing aerosol cans, which were labeled as flammable gas. Ortega instructed VAFB to label these containers as reactive solids since the gases are contained in metal cylinders or cans. VAFB wanted confirmation on this before changing the labels. The south bay contained a few hundred drums of flammables, acids, PCBs and other wastes. There were 3 drums containing a mixture of gasoline, diesel, coolant, oil and soap (see Attachment 4). I inquired why they would generate such a mixture. VAFB explained that this waste was generated at the transportation facility when they dismantle engines. engines are damaged, often different fluids get mixed inside. VAFB stated they have tried to minimize this cross-contamination but some mixing is inevitable. VAFB does not intentionally mix any wastestreams. In the north bay, there were a few hundred drums of

toxic wastes, bases, ethylene glycol, grease and oil. We then went to the office to review Jacob Engineering's records, including training, weekly facility inspection logs, contingency plan and operating records, both a log and computer tracking system. All records inspected were adequate.

We next went to the transportation building to inspect the management practices of automotive fluids. Accumulation drums are stored outside of the building in a steel shed. The drums had spill-proof funnels in the bung holes. The approximately 2000 gallon used oil tank is no longer in use. Just west of the building there are 3 oil/water separators identified as # 10711 (2) These numbers don't exist on the tiered permitting and 10713. notification submitted to the Department, but one unit from the notification has been closed and one existing unit was over-looked at the time of notification (see Attachment 5). Therefore, there is only one additional unit, however, VAFB needed to submit 3 new/revised operating unit notifications and notification. VAFB stated that this transportation building is new and clarifiers # 10711 have replaced a clarifier, # 10726, at the old transportation building which has been closed. not notify the Department that this clarifier has been closed, nor have they notified the Department of clarifiers # 10711 and 10713. The 10711 clarifiers consist of four compartments each which are accessible by man-hole covers (see Attachment 6). VAFB opened the first and last covers on the southern # 10711 clarifier (see Attachment 3, Photo 1). Both compartments appeared to contain oily wastes (see Photo 12). VAFB has the sludge pumped out "when they determine it needs it" or approximately every two months. final compartment drains via a 6" pipe directly into the sewer. The water level was approximately half way up the pipe opening so surface wastewater was flowing into the pipe. compartments emitted heavy hydrocarbon odors. The sanitation district does not monitor sewer flow until it is off the base and diluted by hundreds of other sources. VAFB then opened clarifier This was a single compartment # 10713 (see Photos 3 & 4). clarifier with a board that catches the sludge. There was rustcolored sludge in this clarifier. There was no notification for VAFB stated that this unit was over-looked due to the construction of the transportation maintenance building.

Next, we went to clarifier # 10715 which is southeast of the transportation building (see Photo 5). This clarifier receives rinse water from heavy machinery (bull-dozer, etc.) washing. The first compartment of this clarifier was completely filled with sand. The second compartment was full of water which was slightly green and had no noticeable amount of oil. VAFB stated that this clarifier needs to be pumped every two weeks because the sand washed from the machinery fills the sump. Then we went to clarifier # 8425 which is being rebuilt and not yet in service (see

Photo 6). This clarifier receives rinse water from washing portable generators.

We went to the printed circuitboard shop and met with Warren Ray and Scott Bonhoff who walked us through the plating and rinse water treatment systems. The gold and solder plating systems are close looped. The copper plating baths, however, are batch-treated in a de-plating machine. The copper level in the bath water is lowered from approximately 400 ppm to under 1 ppm in this system. VAFB has notified the Department that they are operating this unit under conditional authorization. The notification and contingency plan were posted. VAFB also performed sandblasting and painting at this shop. Outside of the building is a hazardous waste/material storage shed with one drum of hazardous waste.

Next, we went to the auto hobby shop and met Chuck Neil. inspected a steel shed outside of the building used to store hazardous wastes and materials. Then we inspected oil/water separator # 6437. Also outside of the building there was a 2000 gallon used oil tank marked hazardous waste but with no hazardous waste label (see Photo 7). I told VAFB that this tank needs to be labeled as hazardous waste. Bodine told VAFB that the tank needs to be marked used oil. VAFB stated that they would label and remark the tank. The tank is emptied by Black Gold every 45-60 days. Inside the building there were two 55-gallon used oil accumulation drums with no labels. Neil stated that the drums are emptied into the tank at the end of each day. I told VAFB that the drums need to be labeled as hazardous waste but instead of an accumulation start date they could write "emptied daily". I checked the inspection logs which were adequate.

Finally, we went back to the Environmental Management Office and held a briefing and quickly went over the plans for the next day of inspection. We left the base at approximately 1700 hours.

On the second day of the inspection, we met US EPA inspector Diane Bodine and Master Sergeant Naputi at the main gate and then proceeded to meet at the Environmental Management Office at approximately 0830 hours. We held an opening briefing for the benefit of Bodine as well as to coordinate the day's inspection. Col. Van Mullem granted consent to continue the inspection.

We caravaned to the south base where we inspected the hypergolic stockpile storage facilities (HSSF). There was no hazardous waste at the oxidizer (nitrogen tetroxide) storage area and only 2 drums at the hydrazine storage area.

Then we went to the solid rocket motor (SRM) X-Ray facility and met with Darrel Sill and Greg Williams who showed us a diagram and then the actual silver recovery system. There are 2 parallel semi-

closed loop systems each including a film developing machine which are used alternately each week for maintenance. Three waste streams come out of the developing machines including fixer (the hazardous component), developer and water. The fixer solution is run through a Rotex Ultra 12 silver recovery unit then through three 5-gallon steel wool canisters, three 30 gallon "Big Woolie" steel wool canisters and into one of two 6,000 gallon storage tanks along with the developer solution. The wastewater from these tanks is sampled and if determined to be non-hazardous, it is trucked and emptied into the SLC-6 evaporation ponds. This wastewater has never met hazardous characteristic criteria. The tiered permitting notification and contingency plan were posted above the unit.

Next we went to Space Launch Center - 6 (SLC-6). The former CAP was empty and no longer used. Across the driveway, we met Pete Cole who gave us a tour of the UV-ozone wastewater treatment facility. This facility has two treatment processes. The UV-ozone system treats wastewater contaminated by fuels for 16 hours to nondetectable limits. The treated water is sent to a white 90,000 gallon tank next to the evaporation ponds (see Photos 9 & 10), tested and either released into the ponds or re-treated. treats non-hazardous wastewater containing small amounts of hydrazine and is applying to the Department to treat up to 3% hydrazine. The other process uses a precipitation/reverse osmosis system (PROS) to treat metal-containing wastewater. This system three by-products including approximately 80% recovered industrial water, brine water which is sent to the evaporation ponds, and hazardous waste filter cake. This facility started operation at the end of November, 1991. The two systems are fed from three tanks, # 503 (28,000 gallons), # 502 (22,000 gallons) and # 501 (22,000 gallons).

At approximately 1400 hours, we arrived at the RCRA ISD storage building and met with Tracy Cole from Defense Reutilization and Marketing Office (DRMO). There were several hundred containers in the ISD storage building and Ortega and I inspected nearly each container and label. VAFB had many drums stacked on third level shelves which could not be readily inspected. VAFB stated that most of these drums were empty and there usually is not this many containers at the facility. Ortega requested VAFB to lower 2 pallets with a forklift for inspection. Ortega and I found several drums which were marked empty though they contained pourable amounts, as much as 5 gallons, of waste (see Photo 11). requested a ladder to inspect the rest of the third level drums. VAFB brought a rolling ladder from elsewhere on the base. reviewed the operating and inspection logs and found them to be adequate. The contingency plan was posted on the wall with updated coordinators and phone numbers.

We returned to the Environmental Management Office to review

records which were in the following order:

Part A - 1/19/95 Part A was present.

ISD - 12/18/81 ISD was present.

Operation Plan - 1/95 Revised operation plan (Part B) was present and adequate.

Waste Minimization Plan - Present and adequate.

Hazardous Waste Management Plan - Present.

Closure Plan - The closure plan included in the Part B was complete and adequate.

Annual Report - The 1994 annual report was present and adequate.

Spills & Releases Report - There were several reports of minor spills or releases. Ortega told VAFB that the reports should include the corrective measures taken and how the waste was containerized and disposed.

Tiered Permitting Notifications - VAFB did not submit notifications for two new oil/water separators and of an existing one that was over-looked. VAFB did not notify the Department that they closed an oil/water separator. I told VAFB to identify all of the past and present units and submit revised notifications. I also told VAFB to submit a new plot plan showing the location of each unit.

We held a debriefing meeting with VAFB's Environmental Management staff for the benefit of US EPA inspector Bodine as well as for VAFB.

On the third day of the inspection we met briefly at the Environmental Management Office at approximately 0800 hours and then went to the DRMO office to review records. Ortega and I reviewed all outgoing manifests generated since the last inspection, June 22, 1994. There was a discrepancy on one load that was initially rejected but was later received. VAFB provided a letter from the TSD clarifying the situation and confirming that the shipment was accepted (see Attachment 7). Ortega then reviewed the inspection logs for the tiered permitting units. Ortega told VAFB that the logs need to include measures and dates of correction of problems.

Ortega and I informed VAFB that we wanted to collect samples of one of the oil/water separators and requested VAFB's assistance. At approximately 1030 hours we arrived at the transportation building

to collect the samples (see Section IX).

At approximately 1500 hours we returned to the Environmental Management Office. We held a closing meeting with VAFB and contractor staff to discuss concerns and potential violations found during the inspection (see Attachment 8).

IX. Sampling Summary and Laboratory Results:

At approximately 1030 hours on April 21, 1995 we prepared to collect samples. At approximately 1100 hours John Galp of VAFB collected samples # VA-LS-01 A & B and VA-LS-02 A & B. Galp used a Teflon pond dipper, provided by VAFB, to collect the samples and then split the samples into our 500 ml jars and VAFB's 1000 ml jars. I sealed the samples with evidence tape and Ortega photographed them (see Photo 13). The water was grey and cloudy but there was no distinct oil layer. The samples were placed in an ice chest in our van. The samples were locked in our van for the rest of the inspection and until we arrived at the Region 3 office. I placed the samples in the Department's sample refrigerator and locked it. On April 25, 1995, I drove the samples over to the Southern California Laboratory and transferred custody of the samples to Janice Wakakuwa (see Attachment 9).

Southern California Hazardous Materials Laboratory analyzed samples VA-LS-01 A and VA-LS-02 A using EPA method 6010 and did not detect levels of any metal above 1 mg/l (see Attachment 10, pages 1-3). The Southern California Lab also analyzed samples VA-LS-01 A and VA-LS-02 A for total recoverable petroleum hydrocarbons using SCL method 418. The levels of petroleum hydrocarbons, 56 mg/l and 47 mg/l, are below the Sanitation Districts limits of 100 mg/l (see Attachment 10, pages 4-8).

X. <u>Unresolved Issues</u>:

There are no unresolved issues. VAFB has updated the tiered permitting notifications including plot plans. VAFB changed the labels on the drums marked empty by the end of the inspection and has sent them to a TSDF as hazardous waste.

XI. Violations:

Count 1: Health and Safety Code (H&SC), section 25200.3 (f).

On or about April 19, 1995, VAFB failed to notify the Department in writing, not less than 60 days prior to commencing the first treatment, in that, VAFB is operating two new oil/water separators and one that was previously operating but was overlooked without notifying the Department.

Evidence: VAFB stated that units # 10711 were not notified because they were under construction at the time of notification. VAFB stated that the oil/water separator at the old transportation building has been dismantled along with the building. The Department has not received notifications of the two oil/water separators installed outside of the new transportation building # 10711. VAFB stated that they omitted oil/water separator # 10713 by mistake.

Compliance: VAFB has submitted notifications and plot plans for these new units. No further action is necessary.

Count 2: H&SC, section 25200.3 (h).

On or about April 19, 1995, VAFB failed to notify the Department in writing that VAFB has permanently ceased operation of a treatment unit and that all activities required under this section have been completed, in that, VAFB has ceased operation and has demolished the oil/water separator unit at the former transportation building.

Evidence: VAFB stated that the oil/water separator unit at the previous transportation building, identified as # 10726, has been closed. Two new units, identified as # 10711 have been installed at the new transportation building to take the place of the # 10726 unit.

Compliance: VAFB shall, within 15 days, submit to the Department a written notification that unit # 10726 has been decontaminated and closed.

XII. <u>Discussion With Management</u>:

At approximately 1230 hours of the third day of inspection, Department inspectors met with VAFB's environmental management staff and contractor staff to discuss our concerns and potential violations. At the end of the closing meeting I provided VAFB with a copy of the Summary of Violations (see Attachment 8).

XIII. Attachments:

- 1. Part A Application Submitted January 19, 1995 9 pages.
- Maps of Vandenberg Air Force Base 2 pages.
- 3. Photographs from April 19-21, 1995 inspection 7 pages.
- 4. Hazardous Waste Profile Automobile Fluids 3 pages.

- 5. List of Tiered Permitting Units 1 page.
- 6. Diagram of Oil/Water Separator # 10711 1 page.
- 7. Letter from CWM to VAFB showing acceptance of load 1 page.
- 8. Summary of Violations, certification of compliance and Split Sample Receipt 5 pages.
- 9. Sample Analysis Request/Chain of Custody 1 page.
- 10. Sample Results from April 21, 1995 sampling 8 pages.
- 11. Tiered Permitting Checklist 2 pages
- 12. EPA Inspection Checklist 17 pages.

XIV. Signatures:

Larry Stuck

Hazardous Substances Scientist

Region 3 (Glendale)

Statewide Compliance Division

Department of Toxic Substances Control

Date Submitted

Robert Kon

Supervising Hazardous Substances Scientist I

Region 3 (Glendale)

Statewide Compliance Division

Department of Toxic Substances Control

5-26-95 Date Approved

ATTACHMENT 1

Part A Application Submitted January 19, 1995 - \$ pages.

For EPA Regional Use Only Use Only United States Environmental Protection Agency Washington, DC 20480 Hazardous Waste Permit Application Part A (Read the Instructions before starting) 1. ID Number (s) A. EPA ID Number C. A. 9. 5. 7. 0. 0. 2. 5. 1. 4. 9. 9. 9. 10. Number (If applicable) Ti. Name of Facility V. A. N. D. E. N. B. E. R. G. A. J. R. P. D. R. C. P. B. A. S. P. 11. Name of Facility V. A. N. D. E. N. B. E. R. G. A. J. R. P. D. R. C. P. B. A. S. P. 11. Name of Facility V. A. N. D. E. N. B. E. R. B. A. F. B. C. C. A. 9. 3. 4. 3. 7. 5. 0. 0. (county Code county Name O. 8. 3. S. A. N. T. A. B. A. R. B. A. R. B. A. R. A. B. B. A. R. B. B. B. Land Type Center Code) LATTIUDE (suppress, minuses, & seconds) LATTIUDE (suppress, minuses, & seconds) V. A. N. D. E. N. B. E. T. B. U. T. L. D. T. N. G. 7. 0. 1. 5. N. F. S. N. F. E. T. B. U. T. L. D. T. N. G. 7. 0. 1. 5. N. F. S. Street or P.O. Box Street or P.O. Box O. S. D. W. J. E. N. D. P. N. D. P. D. D. P. D. D. T. N. G. 7. 0. 1. 5. S. State ZIP Code V. A. N. D. R. N. D. P. N. D. P. D. D. P. D. D. T. N. G. 7. 0. 1. 5. S. State ZIP Code V. A. N. D. R. N. D. P. N. D. P. D. D. P. D. D. T. N. G. 7. 0. 1. 5. S. State ZIP Code V. A. N. D. R. N. D. P. N. D. P. D. D. P. D. D. T. N. G. 7. 0. 1. 5. S. State ZIP Code V. A. N. D. R. N. D. P. N. D. P. D. D. P. D. D. T. N. G. 7. 0. 1. 5. S. State ZIP Code V. A. N. D. P. N. D. P. N. D. P. D. D. P. D. D. T. N. G. 7. 0. 1. 5. S. State ZIP Code	and some and the think of the second	F " " " " " " " " " " " " " " " " "	GSA NO. 0246-EPA
Hazardous Waste Permit Application Part A (Read the Instructions before starting) I. ID Number(s) A. EPA ID Number C A 9 5 7 0 0 2 5 1 4 9 III. Name of Facility V A N D E N B E R G A T R F O R C E B A S E III. Facility Location (Physical address not P.O. Box or Route Number) A. Street Street (continued) City or Town State zip Code County Code Code County Co		& EPA	For State
Hazardous Waste Permit Application Part A (Read the Instructions before starting) I. ID Number(s) A. EPA ID Number B. Secondary ID Number (If applicable) C A 9 5 7 0 0 2 5 1 4 9 II. Name of Facility V A N D E N B E R G A I R F O R C F B A S F III. Facility Location (Physical address not P.O. Box or Route Number) A. Street Street (continued) City or Town State ZIP Code V A N D E N B E R B A F B C A 9 3 4 3 7 5 0 0 0 Caunty Code County Name B. Land Type C. Geographic Location F 3 4 4 1 0 1 8 1 2 0 3 2 0 5 6 1 0 0 4 1 9 5 8 TIV. Facility Mailing Address Street or P.O. Box State ZIP Code		United States Environmental Protection Agency Washington, DC 20460	
Application		Hazardous Waste Permit	
Part A		Application	
Month Day Year (Read the Instructions before starting)	Date Received		
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A. EPA ID Number B. Secondary ID Number (II applicable) C. A. 9 5 7 0 0 2 5 1 4 9 II. Name of Facility V. A. N. D. E. N. B. E. R. G. A. T. R. F. O. R. C. E. B. A. S. F. III. Facility Location (Physical address not P.O. Box or Route Number) A. Street City or Town State ZIP Code V. A. N. D. E. N. B. E. R. B. A. F. B. C. A. 9 3 4 3 7 - 5 0 0 (County Code (II moven)) County Code (II moven) County Code (II moven) C. Geographic Location (enter code) LATITUDE (serpere, minutes, & seconds) IV. Facility Mailing Address Street or P.O. Box 3 0 S. P. W. / E. T. B. U. T. L. D. T. N. G. 7 0 1 5 S. CRY or Town V. A. N. D. F. N. B. P. R. G. A. T. R. F. O. R. C. F. B. A. S. F. III. Facility Location (Physical address not P.O. Box or Route Number) LONGITUDE (degrees, minutes, & seconds) LONGITUDE (degrees, minutes, & seconds) Month Day Year F. 3 4 4 1 0 1 8 1 2 0 3 2 0 5 6 1 0 0 4 1 9 5 8. IV. Facility Mailing Address Street or P.O. Box B. D. F. N. B. P. R. G. H. D. T. N. G. 7 0 1 5 5 8. CRY or Town V. A. N. D. F. N. B. P. R. G. H. D. T. N. G. 7 0 1 5 5 7 0 1 5 1 5 0 1 5 0 1 5 0 1 5 1 5 0 1 5		(Read the Instructions before starting)	
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	VANDEN		- 6 0 0 .
V. Facility Contact (Person to be contacted regarding waste activities at facility)	V. Facility Contact (Per		
Name (last) (first)			
VANMILITE MITS D	VANMITT		

Phone Number (area code and number)

State

ZIP Code

Х

Job Title

A Contact Address
Location Mailing

City or Town

F

VI. Facility Contact Address (See instructions)

B. Street or P.O. Box

EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
C A 9 5 7 0 0 2 5 1 4 9	
VII. Operator Information (see Instructions)	
Name of Operator	
VANDENBERG ATR	FORGEBASE
Street or P.O. Box	
30 SPW/ET BUILD	I N G 7 O 1 5
City or Town	State ZIP Code
V A N D E N B E R G A F B	C A 9 3 4 3 7 - 6 0 2 1
Phone Number (area code and number) B. C	Operator Type C. Change of Operator Date Changed
8 0 5 - 7 3 4 - 8 2 3 2	Indicator Month Day Year Yes No
VIII. Facility Owner (see Instructions)	
A. Name of Facility's Legal Owner	
DEPARTMENT OF T	HEATRFORCE
Street or P.O. Box	
City or Town	State ZIP Code
VANDENBERCAER	
V A IN D E N B E R G A F B	
	B. Owner Type C. Change of Owner Date Changed
Phone Number (area code and number)	Indicator Month Day Year
3 0 5 - 7 3 4 - 8 2 3 2	F Yes X No 1 0 0 4 5 8
IX. SIC Codes (4-digit, in order of significance)	
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Vandenberg AFB is a National Defense Installation and is the headquarters for the 30th Space Wing, Air Force Space Command. Vandenberg AFB houses Department of Defense (DOD) and non-DOD government organizations along with civilian aerospace contractors that routinely participate in the launch of polar orbiting satellites, the testing of inter-continental ballistic missiles, and many other research and development, and space operations activities.

XII. Process - Codes and Design Capacities

- A. PROCESS CODE Enter the code from the list of process codes below that best describes each process to be used at the facility. Twelve lines are provided for entering codes, if more lines are needed, attach a separate sheet of paper with the additional information. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided in item XIII.
- B. PROCESS DESIGN CAPACITY For each code entered in column A, enter the capacity of the process.
 - 1. AMOUNT -Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process unit.
 - UNIT OF MEASURE For each amount entered in column B(1), enter the code from the list of unit measure codes below that
 describes the unit of measure used. Only the units of measure that are listed below should be used.
- C. PROCESS TOTAL NUMBER OF UNITS Enter the total number of units used with the corresponding process code.

PROCE CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	UNIT OF MEASURE	UNIT OF MEASURE CODE
D79 D80 D81 D82 D83 S01 S02 S03 S04	DISPOSAL: INJECTION WELL LANDFILL LAND APPLICATION OCEAN DISPOSAL SURFACE IMPOUNDMENT STORAGE: CONTAINER (barrel, drum, etc.) TANK WASTE PILE SURFACE IMPOUNDMENT TREATMENT: TANK SURFACE IMPOUNDMENT	GALLONS; LITERS; GALLONS PER DAY; OR LITERS PER DAY ACRE-FEET OR HECTARE-METER ACRES OR HECTARES GALLONS PER DAY OR LITERS PER DAY GALLONS OR LITERS GALLONS OR LITERS GALLONS OR LITERS CUBIC YARDS OR CUBIC METERS GALLONS OR LITERS GALLONS OR LITERS GALLONS PER DAY OR LITERS PER DAY GALLONS PER DAY OR LITERS PER DAY	GALLONS	CEULHVDDDD
T03	INCINERATOR OTHER TREATMENT (Use for physical, chemical, thermal or biological treatment processes not occurring in lanks, surface impoundment or incinerators. Describe the processes in the space provided in item XIII.)	SALLONS PER DAY ON DIERS PER DAY SHORT TONS PER HOUR; METRIC TONS PER HOUR; GALLONS PER HOUR; LITERS PER HOUR; OR BTU'S PER HOUR GALLONS PER DAY; LITERS PER DAY; POUNDS PER HOUR; SHORT TONS PER HOUR; KILOGRAMS PER HOUR; METRIC TONS PER DAY; METRIC TONS PER HOUR; OR SHORT TONS PER DAY	KILOGRAMS PER HOUR CUBIC YARDS CUBIC METERS ACRES ACRES HECTARES HECTARE-METER BTU's PER HOUR	URRCBAQ

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	Secondary ID Number (enter from page 1)	
EPA I.D. Number (enter from page 1)		
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XIV. Description of Hazardous Wastes	The state of the s	200 Avenue

- A. EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Part 261 Subpert D of each listed hazardous waste You will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the loxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each flated waste entered in column A estimate the quantity of that waste that will be ESTIMATED ANTIQUE SET For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be hendled which possess that characteristic or contaminent.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code, Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE .	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	Р	KILOGRAMS	K M
TONS	7	METRIC TONS	· · · · · · · · · · · · · · · · · · ·

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste; For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the ilst of process codes contained in Rem XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that processes that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

- Enter the first two as described above.
- Enter "000" in the extreme right box of item XIV-D(I).
- 3. Enter in the space provided on page 7, item XIV-E, the line number and the additional code(s).
- 2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(Z)).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Humbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- 2. In column A of the next line enter the other EPA Hazardous Waste Humber that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
- 3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landitit.

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ADDITIONAL INFORMATION

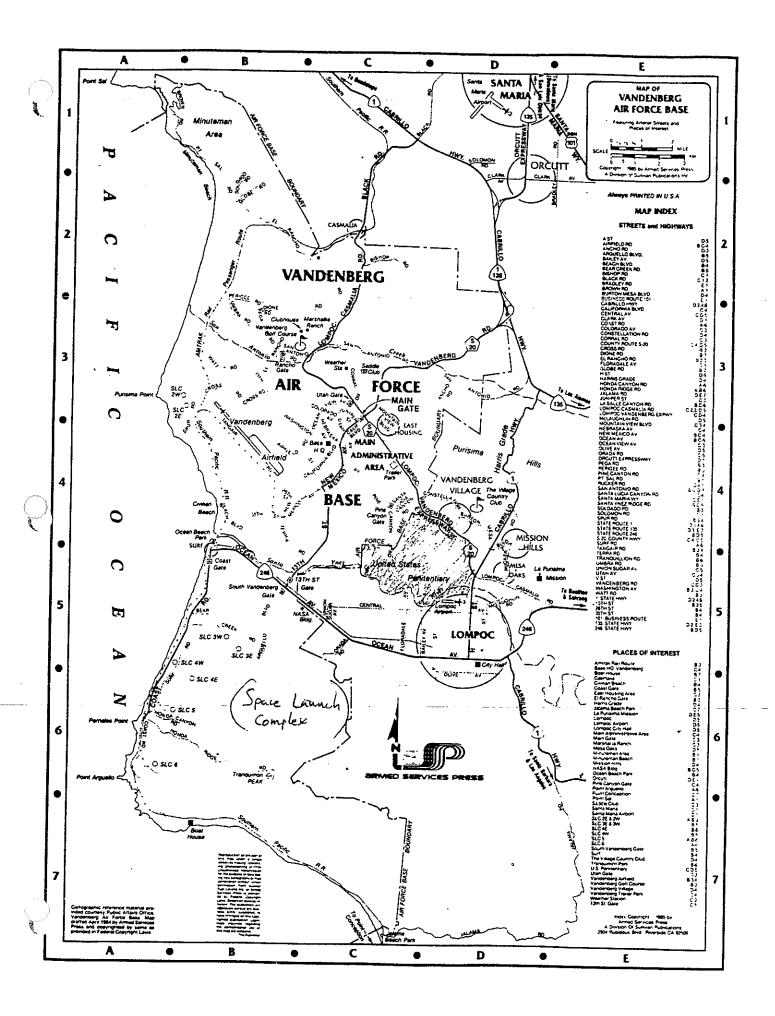
- The information presented in this application covers the following existing or proposed hazardous waste treatment and/or storage units within the facility boudaries of Vandenberg Air Force Base (AFB). They are:
 - DRMO Storage Building
 - EOD Range
 - SLC-6 Industrial Wastewater Treatment Plant (IWTP)
- 2. Colonel Louis D. Van Mullem full telephone number at Vandenberg AFB is 805-734-8232, Ext. 6-0365.
- 3. 40 CFR 270.13(f). Vandenberg AFB is not located on indian land.
- 4. 40 CFR 270.13(I). The topographic maps within this application show the location of the various waste management units, water wells, monitoring wells, and surface waters within a mile of the Vandenberg AFB boundary. Surface waters are currently used for natural resuorce management purposes, and these activities are expected to continue.
- 5. 40 CFR 270.13(h2) Photographs of the various units described in the permit application are enclosed. All photographics in this permit application were taken on various days during the period of October November 1992.

All maps and drawings required by this permit application are contained in the map pockets which follow.

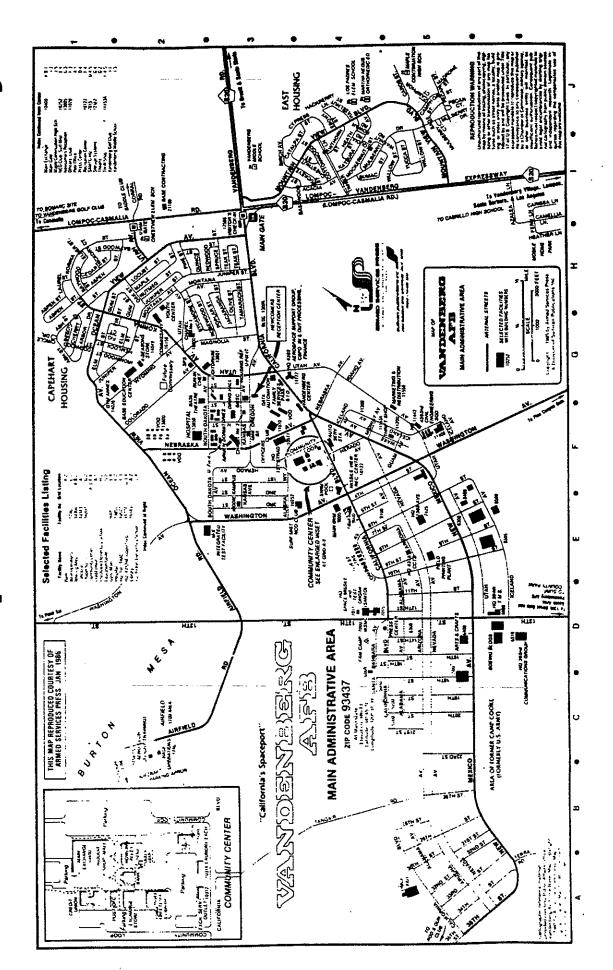
ATTACHMENT 2

Maps of Vandenberg Air Force Base - 2 pages.

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ATTACHMENT 3

Photographs from April 19-21, 1995 inspection - 7 pages.



Photo 1. by Carlos Ortega on 4/19/95.
View east at clarifier (oil/water separator) # 10711
located outside of the transportation maintenance
building.



Photo 2. by Carlos Ortega on 4/19/95.

View into the final chamber of clarifier # 10711.



Photo 3. by Carlos Ortega on 4/19/95.

View east at clarifier (oil/water separator) # 10713
located outside of the transportation maintenance
building and south of number # 10711.



Photo 4. by Carlos Ortega on 4/19/95.
View into the chamber of clarifier # 10713.



Photo 5. by Carlos Ortega on 4/19/95.

View east at the second/final chamber of clarifier

(oil/water separator) # 10715 located southeast of the
transportation maintenance building.

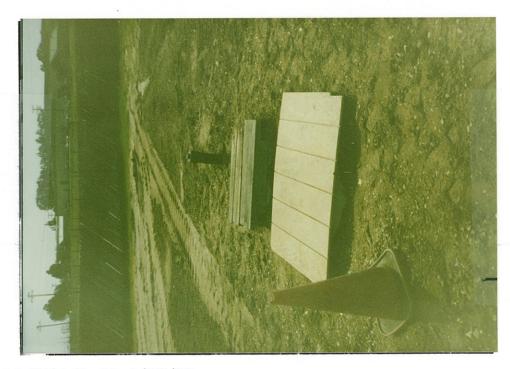


Photo 6. by Carlos Ortega on 4/19/95.

View south at clarifier (oil/water separator) # 8425.

Note unit is undergoing reconstruction and is not in use. This unit will treat portable generator wash water.



Photo 7. by Carlos Ortega on 4/19/95.
View northwest at 2,000 gallon used oil tank at the auto hobby shop. Note there is no hazardous waste label.



Photo 8. by Carlos Ortega on 4/20/95.

View east at "sumps" collecting treated x-ray developer and fixer wastes at the SRM X-ray facility.



Photo 9. by Carlos Ortega on 4/20/95. View west at north evaporation pond at SLC-6.



Photo 10. by Carlos Ortega on 4/20/95.

View south at north and south evaporation ponds at SLC6.



Photo 11. by Carlos Ortega on 4/20/95.

View north at four of several drums labeled as empty though they contained pourable quantities of hazardous waste.



Photo 12. by Carlos Ortega on 4/21/95.

View into the final chamber of clarifier # 10711.



Photo 13. by Carlos Ortega on 4/21/95.

View north at samples # VA-LS-01 A & B and AV-LS-02 A & B in front of clarifier # 10711 where they were collected.

Hazardous Waste Profile - Automobile Fluids - 3 pages.

	EPROFILE/RECEIPT SHEET	58
CONTAINER NUMBER 0649 12. CONTAINER TYPE	- 1 The Mental Mid Ondanizati	
WEIGHT (LES) 79 9	58 Bung 130 TRNS	F- H-
2 VOLUME (6/11/01/5)	Scot 172 TAB	F-
$\frac{1}{2}$	062 .02,03,06,08 /09	9. HAZARD CLASS
10. DOT SHIPPING NAME	-7-700,08 707	ر کی
WASTE FLAMMABLE LIQUIDS N.O.S	. (Benzine)	
11. GENERATING PROCESS	12. SUPPLY ORGANIZATION NUMBER (DO	DUACT)
13. START DATE OF CONTAINER	14. DATE CONTAINER SMIPPED	
15. HAZARDOUS WASTE NUMBER		
UNINA RUMEER UN 1993	16.	
EPA NUMBER DOOL / DOIS	RECOVERABLE (YESMO)	<u> </u>
CA NUMBER C343	(IF YES, NOTE "RECOVERABLE" AT	TOP AND EDITOM OF FORM)
17. LIST COMPONENTS	HAZARD CLASS	CONCENTRATION
"Waste Gasoline (Benzene)	3	15 %
= Waste Viesel Fuel	3	
c Woste Engine Oil	NON RCRA	25
D Waste Coolont (Ethylene Glycol)	NON RCRA	15 %
E Waste Soop (Simple Gren)	NON RCRA	1) %
- Waste Transmission Fluid		15 %
	NON RCKA	20 4
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1		<u>. y.</u>
J		<u> </u>
NOUN NAMEMONHAZARDOUS		94
"MUST TOTAL 100%		<u> </u>
18. WASTE PROPERTIES ICHRELAIL TRALAMENT		100 %
(TURIL)	BUSTIBLE REACTIVE SENS	
IS PHYSICAL STATE	EUSTIELE REACTIVE SENS	TIZER CARCINOGEN
- Dionio	STABGE	
20. PERSONNEL PROT		GAS ,
CLOSED CONTAINER – USE APPROPRIATE HANDLING EQUIPMENT.		
EXPOSURE TO SUESTANCE GLOVES GOG	GLES ZEGOTS	<u> </u>
REMARKS: THIS IS TO CERTIFY THAT THE GROWS MANGE		OTHER
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5. WEIGHY (LBS)	<u> </u>	F-
7. VOLUME (GALLONS)	Sect 172 TAB	H- R-
35 B. WASTE STREAM!	DENTITY CODE	9. HAZARD CLASS
10. DOT SHIPPING NAME	2 .02,03,06,08/09	3
LIASTE FLAMMABLE LIQUIDS N.O. S.	(D4:):	
11. GENERATING PROCESS	1 12. SUPPLY OSGANIZATIONIA DILIZZED VA	
13. START DATE OF CONTAINER	1 231 7/6/	DACT)
1 1 1 1 1 1 1	14. DATE CONTAINER SHIPPED	
15. HAZARDOUS WASTE NUMBER UNINA NUMBER UN 1993	116.	
EPA NUMBER DOOL / DOIS	RECOVERABLE (YESMO)	
CA NUMBER C343		
17. LIST COMPONENTS	(IF YES, NOTE "RECOVERABLE" AT	TOP AND EOTTOM OF FORM)
1. /1 / 0	EAZARD CLASS	CONCENTRATION
	3	15 "
1301	3	13 1/2
Maste Ensine Oil	NON RCRA	15 %
D Waste Coolant (Ethylere Glycol)		<u>25 %</u>
E Waste Soap (Simple Green).	NON RURA	15 %
F Wosk Transmission Fluid	NON RURA	10 %
G G	NON RCRA	20 4
		9
		%
		<u> </u>
NOUN NAMEMONHAZARDOUS		<u> </u>
*MUST TOTAL 100%		<u> </u>
18. WASTE PROPERTIES (CARCIAIL BALARAY) TOXIC (PLAIMARELE) (OPERATION		100 %
19. PHYSICAL STATE CORROSINETERITANT COMEL	ISTIBLE REACTIVE SENSIT	IZER CARCINOGEN
		OXECTIOGE?
Liquid	. STADGE	GAS '
CLOSED COURTERED	CTIVE EQUIPMENT	
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PACKAGED, MARKED AND LABELED; AND ARE IN CONDITION	MATERIALS ARE PROPERLY CLASSIFIED.	DESCRIBED
PACKAGED, MARKED AND LABELED; AND ARE IN CONDITION AFFLICABLE REGULATIONS OF DOT, EPA, AND THE STATE OF CA	N FOR TRANSPORTATION IN ACCORDANCE	WITH THE
20 TO 16	SUFORMA,	
ORGANIZATIONICOMPANY	RECEIVED	BY (CAP)
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	AZARDOUS WAST	E PROFILE/RECE	PT SHEET G	P	
1. CONTAINER NUMBER - 0393	2. CONTAINER TYP	1 - 0	RIGINATING ORGANIZATI	ON 4. NFPA	
WEIGHT (LES)	6. PROCEDURE USE		TRNS	F-	
VOLUME (GALLONS)	149 CFK	Sect 172	TAB	H- R-	
GAL	8. WASTESTREAM	IDENTITY CODE	3,06,08,09	9. HAZARD CLASS	
10. DOT SHIPPING NAME			3,00,00,09	3	
Uaste Flammable Liquic	1 110' 1	P.			
11. GENERATING PROCESS	70,0.3, (1 12. 30rrt1 Ont	PANIZATION NUMBER (DO	20÷CT1	
13. START DATE OF CONTAINER		1 227	HW		
9 566 94		14. DATE CONT.	AINER SHIPPED		
15. HAZARDOUS WASTE NUMBER UMMA NUMBER UN 1993	-	16.	(2		
EPA NUMBER DOOL DOIS		RECOVE	RASLE (YES/NO) N	<u> </u>	
CA RUMBER 2347		- (IF YES, I	TA TELEGRES STOR	TOP AND EDITION OF E	C::
17. UST COMPONENTS				1	——————————————————————————————————————
			HAZARD CLASS	CONCENTRATIO);;
1. Waste Gasdine (Benzen	()	_	3	20	
6 Waste Engine Oil			NON REKA	35	%
· Waste Transmission Flo	uid		NON RCKA		÷;
o Wask Coolant (Ethyl	ene Glycol)			20	- 55
E Waste Soap (Simple G)	\ - '		NON RCKA	20	%
F			NON RCRA	15	%
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					54
Ey					94
			.,		%
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NOUN NAMEMONHAZARDOUS		•		1	4/4
*MUST TOTAL 100%				100	
18. WASTE PROPERTIES (CACITAL HATART)				100	- 4
CORROSINE CORROSINE	MO) CULATIEE	BUSTIBLE	REACTIVE SENS	ITIZER CAECINO	GEN
19. PHYSICAL STATE	\				
SOLID	Trionio	<u></u>	LUDGE	GAS	,
	20. PERSONNEL PROT	ECTIVE EQUIPMENT	Ĭ		
CLOSED CONTAINER - USE AFFROPRIATE HANDLING	EQUIPMENT.		·		
EXPOSURE TO SUBSTANCE GLOVES	,X cod	circ	<u> </u>		
			E0015	OTHER	
REMARKS: THIS IS TO CERTIFY THAT PACKAGED, MARKED AND LARGED	THE ABOVE NAME	D MATERIALS ARE	PROPERLY CLASSIFIED	DESCRIBED,	
PACKAGED, MAŘKED AND LASSLED; AFFLICASLE REGULATIONS OF DOT, EP ORIGINATOR	A. AND THE STATE OF	ION FOR TRANSPO. CALIFORNIA	RTATON IN ACCORDAN	CE WITH THE	
ORIGINATOR TRNS		11	• •		
ORGANIZATION/COMPANY				ED BY (CAP)	
PHONE NUMBER PRINCIPLE	. •	;	FINT NAME	1	
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VAINE 10711		\$	IGNATURE		
TNATURE CORGE	DAV. S		m?-	0	
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List of Tiered Permitting Units - 1 page.

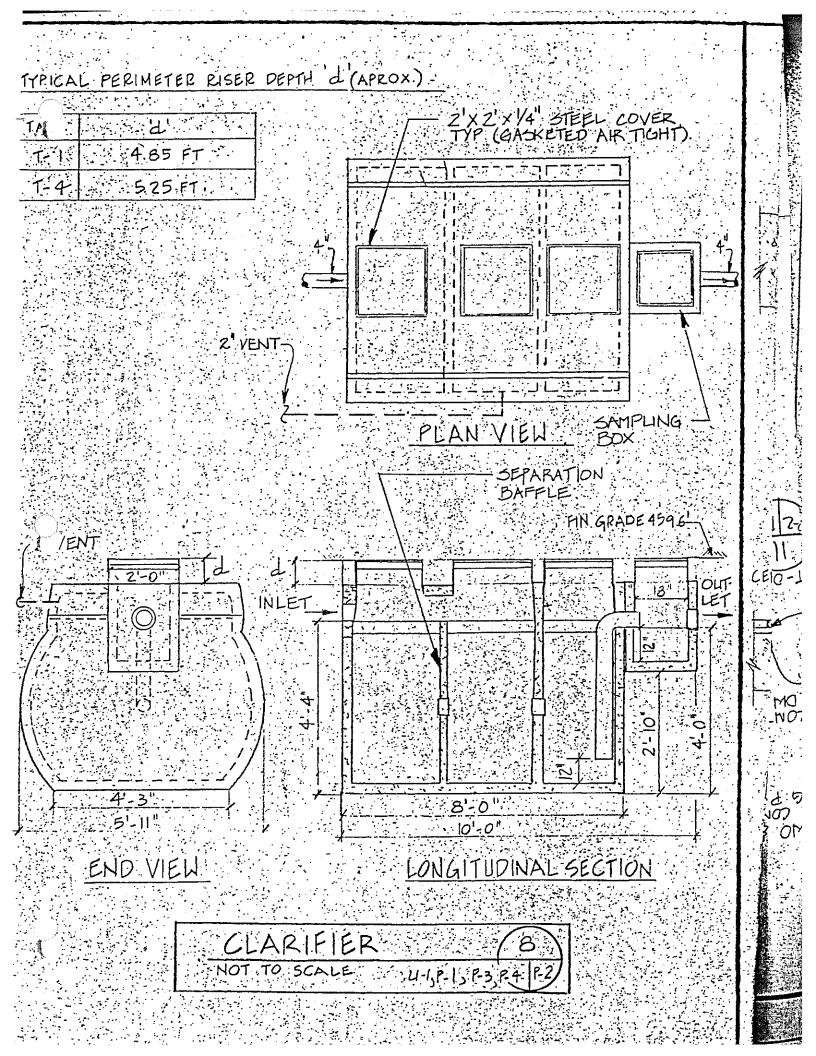
Conditionally Authorized

	#	Units Authorized	Units on VAFB	Location	Notified to DTSC
	1 2 3 4 5 6	525 1705 1725 1731 1783 1856	525 1705 1725 1731 1783 1856	Power Plant Flight line, Fuel Storage Flight line, Det 8 Flight line, Air Field Road Power Plant #1 Power Plant #2	yes yes yes yes yes
will closured	9 10 11 12 13	6437 7438 8425 10600 10601 10702 10715 10726 Old teamsp	6437 7438 8425 10600 10601 10702 10715	Auto Hobby Shop LockMart, Main Base Field Power BX Service Station BX Car Wash 30 TRNS, Car Wash 30 CE, Pavement and Grounds 30 TRNS, Motor Pool	yes
(15 16 16	9320PCBS 946	10713 10711 2 miss A,B	30 TRNS, Heavy Equipment 30 TRNS, Motor Pool Printed Circuit Board SRM X-Ray Facility	no no (New 30 TRNS Motor Pool building) yes yes
silver recovery	18	9340		30 AVS, Silver Recovery Unit	yes

Application signed by Col Abel, 3 Mar 93; Pages 1 of 64
 Two forms submitted for building 10726 in the application
 Building 10713 was not submitted (occupied by 30 TRNS)
 Building 10711, new 30 TRNS building completed Dec 93, replaced building 10726, demolished Feb 94

⁻ Bldg #8425 needs a permit modification due to recent upgrade of the unit. Permit allows for 500 pounds/month treatment.

Diagram of Oil/Water Separator # 10711 - 1 page.



Letter from CWM to VAFB showing acceptance of load - 1 page.



MENORANDUM

Date:

APRIL 26, 1995

To:

BENNY ROMERO

From:

IRENE GOMES

Subject:

MANIFEST # 93183184

On December 22, 1994 we received waste from DRMO Vandenberg. This waste was rejected the same date. On December 23, 1994 the waste was brought back to our facility and was again rejected.

On December 29, 1994 the same waste was brought in and was accepted as indicated on manifest #93183184.

Irene Gomes //

Record Supervisor

30th Space Wing Vandenberg AFB CA Environmental Management

Visition/Observation #_7

Summary of Violations, certification of compliance and Split Sample Receipt - 5 pages.

EPARTMENT OF TOXIC SUBSTANCES CONTROL

. N. GRANDVIEW AVENUE GLENDALE, CA 91201 (818) 551-2800



SUMMARY OF VIOLATIONS

On 4/19-21/95 the Department of Toxic Substances Control, California Environmental Protection Agency, conducted an inspection at:

facility name: Vandenberg Air Force Base facility address:

EPA ID Number: CA 95700 25149 county name: Santa Barbara

As a result of that inspection, the violations of hazardous waste laws, regulations, and requirements listed on the attached pages were discovered. All violations must be corrected; the actions you must take to correct the violations are listed with each violation. If you disagree with any of the violations or proposed corrective actions listed in this Summary of Violations, you should inform the Department. If you disagree with any of the violations listed in Section I, you must give the inspector who issued this Summary of Violations a written notice of disagreement.

You must correct the violations listed in Section I, Minor Violations, within times specified. You must sign the statement certifying compliance at the bottom of Section I and return it to the Department at the address provided by 5-21-95. A false statement that compliance has been achieved is a violation of the law and punishable by a fine of not less than \$2,000 or more than \$25,000 for each violation. The Department may reinspect this facility at any time.

The Department will provide you a complete inspection report within 65 days of the date of this inspection. You may request a meeting with the Department to discuss the inspection or the findings of the report. The issuance of this Summary of Violations does not preclude the Department from taking administrative, civil, or criminal action as a result of the violations noted in the Summary of Violations or that have not been corrected within the time provided in Section I.

Authorized Company Representative*	Authorized State Agent
Name Louis D 8 gra Mucom	Name Larry Stuck
Title Chief, Enu Manit	Title Hazardons Substances Scientist
Signature on Mull	Signature Lally Stuck
Date 4-21-95	Date 4-21-95

SUMMARY OF VIOLATIONS

Facility Name:

Date: 4-21-95

Section I MINOR VIOLATIONS

Within five working days of achieving compliance, you are required to sign the certification below, and return it to the Department at the above address.

Failure to correct the violations and certify compliance within the time provided may result in the Department taking additional enforcement action for these violations.

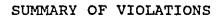
1) VAFB did not notify of closure of 3 oil/water separators.

Within IS days, VAFB shall notify the Dopartment that these units are or will be closed and will initiate or complete closure under Tierrel-Permitting requirements.

- 2) VAFB did not notify the Department of 3 new oil/water separators. Within 15 days, VAFB shall send Tierrel-Permitting notifications to the Department for the 3 new oil/water separators.
- 3) VAFB mis-labeled several containers as empty when they, in fact, contained pourable amounts of wastes.

 Within 5 days, VAFB shall re-inspect all containers marked "empty" re-label and properly manage all containers containing pourable amounts of wastes. I certify under penalty of law that the above corrective actions have been taken and the violations have been corrected. I am aware that there are significant penalties for submitting false information.

Signed	Date	2
Title		



Facility Name:

Date: 4-21-95

continuation sheet for Section I, Minor Violations.

Observations:

- 1) Part A lists EOD capacity in pounds per hour.
- 2) There was no HW label on the used oil tank at the hobby shop.
- 3) There was no HW label on the oil accumulation drum at the hobby shop.
- 4) Two five-gal buckets did not have ItW labels at the "Super CAP" 1) rifle bore solvent 2) used oil
- 5) Several containers labeled as aerosol cans, Flammable liquir gas were mis-labeled. The proper description is reactive, solid.
- 6) There was a concern about the oil/water separators at the transportation building meeting waste water discharge requirements. (samples were collected)
- 7) One manifest had a discrepency about a load rejection.
- 8) There were no inspection records for oil/water separators #5.7438, 8425, 525, 9320 6437.

Page 3 of 4

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

1011 N. GRANDVIEW AVENUE GLENDALE, CA 91201 (818) 551-2800



SPLIT SAMPLE RECEIPT

Received from representatives of the Department of Toxic Substances Control on $\frac{4-21-95}{}$ a requested sample split from samples acquired under the authority of Section 66272.1, Title 22, California Code of Regulations.

The samples are numbered as follows:

1.	VA-LS-01A &B	6.	
2.	VA-15-02 A & B	7.	-
3.	Mark Control of the C	8.	
4.		9	

Signatures:

SUMMARY OF VIOLATIONS

Facility Name:

Date: 4-21-95

Section I MINOR VIOLATIONS

Within five working days of achieving compliance, you are required to sign the certification below, and return it to the Department at the above address.

Failure to correct the violations and certify compliance within the time provided may result in the Department taking additional enforcement action for these violations.

1) VAFB did not notify of closure of 3 oil/water suparators.

within 15 days, VAFB shall notify the Department that these units are or will be closed and will initiate or complete closure under Tierrel-Permitting requirements.

2) VAFB did not notify the Department of 3 new oil/water separators. Within 15 days, VAFB shall send Tierrel-Purmitting notifications to the Department for the 3 new oil/water separators.

3) VAFB mis-labeled several containers as empty when they, in fact, contained pourable amounts of wastes.

Within 5 days, VAFB shall re-inspect all containers marked "empty" re-label and properly manage all containers containing prurable amounts of wastes. I certify under Benalty of law that the above corrective actions have been taken and the violations have been corrected. I am aware that there are significant penalties for submitting false information.

signed Line with!

1 8 MAY 1995

Title Chief Enormented Many

Sample Analysis Request/Chain of Custody - 1 page.

HAZARDOUS MATERIALS	1. Authorization Number	HML No.	2. Page
AMPLE ANALYSIS REQUEST	SC K 2505	То	of
3. Requester: Larry Stuck	4. Phone (818) 551 - 2930	The state of the s	(2) 3
Address (To Receive Results): 1011 N. Care	·	a. Authorized by	
6. Date Sampled 4 - 21 - 95	7. Time Sampled 100 • Hours	8. Codes (fill in all applicab	- Westerness was not out the
9. Activity: 💢 SEB 🗌 SMB 🔲 FPB	FMB HQ OTHER	a. STC 3 0 3 0 b. Region 0 3	
10. SAMPLING LOCATION CA 9	570025149	c. INDEX 6 3 1 0	
Vandenham AFR	a. EPA ID No.	d. PCA 3 7 0 1	5
b. Site Vandenberg AFB		e. MPC 1	
c. Address 806 13th Street	Suite Vanlenbur AFE 93437	f. SITE 3002 g. County	19 4
	City J Zip	0.6. 07	
11. SAMPLES	Sample Contain	::::::::::::::::::::::::::::::::::::::	<u>r in</u> Tabu n jih na
a. ID b. Collector's No. c. Lab	No. d. Type e. Type	f. Size g. Field Inf	ormation
A VA-LS-01 A 146 B VA-LS-02 A 196		500 ml	
<u> </u>			
		Section Control of the Control of th	
F			
12. ANALYSIS REQUESTED f.	VOA-8020	I. Telash	
		Point m. C1-Pes-	
140		ticides	
∕ Scan	VOA-8240	ticides	
c. Metals i. [VOA-8260	o. TRPH 1	# B
d. 🗌 W.E.T j. 🔲	SVO-8270	p. 🗌	
e. 🗌 VOA-8010 k. 🗍	Diesel/ Gasoline	q. 🔲	
13. SPECIAL REMARKS:	**************************************	W	
14. SUPPLEMENTAL	П	Initials	
REQUESTS	T	Date	
15. CHẠIN OF CỰSTODY			
a. Karry Atuck	Larry Stuck Hazardons Sub	stances Scientist 4, 2195	4,25,95
b. anuellaribura.	Junes Wakakuwa/	111 4,25 85-	./_/_
Signature	Name/Titlé /	Inclusive	Dates /
Signature	Name/Title	Inclusive	Dates / /
1, Signature	Name/Title	Inclusive	Dates
16. LAB REMARKS:			
10, LAD REIVIARNS:			

Sample Results from April 21, 1995 sampling - 8 pages.

LABORATORY REPORT

Hazardous Materials Laboratory - Southern California 1449 W. Temple Street Los Angeles CA, 90026-5698 Telephone 213-580-5795 Fax 580-5717

To : Larry Stuck

Date: May 5, 1995

Sample Location :

Vandenberg AFB 806 13th Street, Suite J Vandenberg AFB 93437

Analytical Procedures Used: EPA SW 846 methods 6010

Analysis Results in Mg/L

Field # Lab # Barium

VALS01A 14695 1

VALS02A 14696 <1

Note: Antimony, arsenic, chromium, cobalt, copper, lead, molybdenum, nickel, silver, thallium, vanadium, and zinc were not detected in quantities greater than 1.0 mg/L. Beryllium, cadmium, and selenium were not detected in quantities greater than 0.1 mg/L.

Analyst's Signatures:

avid Eugene Kimbrough

Supervising Chemist's Signature:

Janice Wakakuwa

Quality Control Report for Calibration

Hazardous Materials Laboratory - Southern California 1449 W. Temple Street, Los Angeles CA 90026-5698 Telephone 213-580-5795 FAX 580-5717

To : Larry Stuck

SCL No.: 14695 - 14696

Analytical Procedures Used: EPA SW 846 method 6010

	Reagent Blank	Calibration	Check	Reporting Limi	t Check
		Expected Range	Found	Expected Range	Found
Units	mqq	mg/L	mg/L	mg/L	mg/L
Silver	<1.0	36 - 44	43	1.6 - 0.4	1.3
Arsenic	<1.0	36 - 44	43	1.6 - 0.4	1.1
Barium	<1.0	36 - 44	42	1.6 - 0.4	1.1
Beryllium	<0.1	7.2 - 8.8	8.3	0.16 - 0.04	0.10
Cadmium	<0.1	7.2 - 8.8	8.5	0.16 - 0.04	0.12
Cobalt	<1.0	36 - 44	8.5	1.6 - 0.4	1.2
C mium	<1.0	36 - 44	43	1.6 - 0.4	1.2
Copper	<1.0	36 - 44	43	1.6 - 0.4	1.2
Molybdenum	<1.0	36 - 44	42		
Nickel	<1.0	36 - 44	43	1.6 - 0.4	1.2
Lead	<1.0	36 - 44	42	1.6 - 0.4	1.1
Antimony	<1.0	36 - 44	41		
Selenium	<0.1	7.2 - 8.8 -	8.0	0.16 - 0.04	0.06
Thallium	<1.0	36 - 44	43	1.6 - 0.4	1.3
Vanadium	<1.0	36 - 44	43	1.6 - 0.4	1.1
Zinc	<1.0	36 - 44	44	1.6 - 0.4	1.2

Analyst's Signature

Supervisors Signature

anni lita la Rue 5/5/95

DEPARIMENT OF TOXIC SUBSTANCES CONTROL HAZARDOUS MATERIALS LABORATORY - SOUTHERN CALIFORNIA 1449 W. TEMPLE STREET, LOS ANGELES, CA., 90026 TELEPHONE (213) 580-5795

CASE NARRATIVE

1.	THIS ANALYTICAL REPORT PACKAGE WAS PREPARED FOR SCL SAMPLES 14695,14696					
2.	SAMPLES WERE COLLECTED ON 04/21/95 AT VANDENBERG AFB					
3.	COLLECTOR'S NAME ON THE SAMPLE ANALYSIS REQUEST FORM IS LARRY STUCK					
4.	SAMPLES WERE:					
	RECEIVED ON 04/25/95 BY HAZARDOUS MATERIALS LABORATORY-SO. CAL.					
)	EXTRACTED ON 05/03/95 - 05/04/95 BY SCL METHOD 418 (TPH BY IR)					
	ANALYZED ON 05/05/95 - 05/05/95 BY SCL METHOD 418					
	NOTE: SCL = HAZARDOUS MATERIALS LABORATORY - SO. CAL.					
-	DATA PACKAGE WAS COMPLETED ON 05/08/95					
5.	DURING THE COURSE OF THESE ANALYSES, NO PROBLEM WAS ENCOUNTERED.					
6.	. QC PARAMETERS/INDICATORS WERE WITHIN CONTROL LIMITS.					
7.	HOLDING TIME WAS MET.					

8. INSTRUMENT INITIAL CALIBRATION & CONTINUING CALIBRATION CRITERIA WERE MET.

DEPARTMENT OF TOXIC SUBSTANCES CONTROL HAZARDOUS MATERIALS LABORATORY - SOUTHERN CALIFORNIA 1449 W. TEMPLE STREET, LOS ANGELES, CA., 90026 TELEPHONE (213) 580-5795

INDEX

(SCL 418 FOR SCL 14695 & 14696)

		PAGE
1.	CASE NARRATIVE	1
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з.	HAZARDOUS MATERIALS SAMPLE ANALYSIS REQUEST FORMS	3
4.	LABORATORY ANALYTICAL REPORT(S)	4
5.	QC REPORT FOR a. Method Blank b. Method Standard Recovery c. Laboratory Control Sample c. Sample Duplicate Analysis	5
6.	QC REPORT FOR Matrix Spike / Matrix Spike Duplicate Recovery	6

TOTAL PAGES = 6

Department of Toxic Substances Control Hazardous Materials Laboratory

HAZARDOUS MATERIALS	Authorization Number	HML No.	2. Page
MPLE ANALYSIS REQUEST	SCK2505	Ţo	_ of /
3. Requester: Larry Stuck Address (To Receive Results): 1011 N. Car	4. Phone (8/8) 551 - 2930	, ·	(2) 3
6. Date Sampled 4-21-95	7 Time Sampledy	a. Authorized by	
	7. Time Sampled los • Hours	8. Codes (fill in all applicab	and the control of the control
9. Activity: SEB SMB FP	B FMB HQ OTHER	b. Region 0 3	
10. SAMPLING LOCATION CAP	570025149	c. INDEX 6310	
b. Site Vandenberg AFB	a. EPA ID No.	d. PCA 3 7 0 1	5
5. 5118		e. MPC 1 - 7	
c. Address 806 13th Street	Swite J Vanderberg AFB 93437	f. SITE 3002	4 4 4
Number Street 11. SAMPLES	City Zip	0.4. 07	
5 ID	Sample Contain	er	
a. ID b. Collector's No. c. Lat VA-LS-01 A 146	90 d. Type e. Type	f. Size g. Field Info	rmation
B VA-LS-02 A 146	76 wastewider glass	500 ml	
D			
G			
12. ANALYSIS REQUESTED f.	VOA-8020	I. ☐ Flash Point	
·	VOA-H/S	m. C1-Pes-	
b. Metal A & B h. □	VOA-8240	ticides n. OP-Pes-	
c. Metals i.	VOA-8260	ticides D. TRPH A	d B
(Spec) d. W.E.T.			4 0
J. []	SVO-8270	D	
e. U VOA-8010 k. [^	4· 🔲 🚤	
13. SPECIAL REMARKS:			
14. SUPPLEMENTAL		Initials	
15. CHAIN OF CUSTODY		Date	
a. Karry Stuck	Larry Stuck Hazarlas Suba	tunes Scientist 4 2195. 9	1,25,95
b. Janual Shahura	Name/file	OKAT: 4 1 C 9	
Signature	Name/Title	Inclusive Da	etes etes
Signature	Name/Title		/ / ates
G. Signature	Name/Title	Inclusive Da	/ /
16. LAB REMARKS:		1	

LABORATORY REPORT DEPARTMENT OF TOXICS SUBSTANCES CONTROL HAZARDOUS MATERIALS LABORATORY - SOUTHERN CALIFORNIA 1449 WEST TEMPLE STREET, LOS ANGELES, CA.,90026 TELEPHONE (213) 580-5795

Collector's Name: LARRY STUCK

SCL NO: 14

14695,14696

Sample Location: VANDENBERG AFB

DATE REPORTED:

05/08/95

806 13TH STREET, SUITE J VANDENBERG AFB 93437

Analytical Procedures Used:SCL METHOD 418-TOTAL PETROLEUM HYDROCARBONS BY IR

	TPH ANA				ITATION MIT
	SCL NO.	14695	14696	14695	14696
	COL.NO.	VA-LS-01A	VA-LS-02A		
	MATRIX	WATER	WATER		
ANALYTE	UNITS	MG/L	MG/L	MG/L	MG/L
TOTAL PETROLEUM HYDRCARBONS		56	47	3.0	2.5

NOTE: ND = NOT DETECTED

QUANTITATION LIMIT =

(CONCENTRATION OF LOWEST CALIBRATION STANDARD) TIMES (DILUTION FACTOR)

SAMPLE PREPARATION:

ANALYST:

SUPERVISING CHEMIST:

Javing Corcesky 5-19-95 FAINA GORETSKY DATE

FAINA GORETSKY

DATE

RUSS CHIN

DATE

QUALITY CONTROL (QC) REPORT DEPARTMENT OF TOXICS SUBSTANCES CONTROL HAZARDOUS MATERIALS LABORATORY - SOUTHERN CALIFORNIA 1449 WEST TEMPLE STREET, LOS ANGELES, CA., 90026 TELEPHONE (213) 580-5795

PAGE 1 OF 2

COLLECTOR'S NAME : LARRY STUCK

DATE SAMPLE RECEIVED: 04/25/95

SAMPLING LOCATION: VANDENBERG AFB

806 13TH STREET, SUITE J VANDENBERG AFB 93437

DATE SAMPLE PREPARED: 05/03/95 - 05/04/95

ANALYTICAL BATCH LAB ID NO.: SCL 14695,14696

DATE SAMPLE ANALYZED: 05/05/95 - 05/05/95

ANALYTICAL PROCEDURES USED: SCL METHOD 418 TPH ANALYSIS BY IR

QC REPORT FOR

A: METHOD BLANK

B: METHOD STANDARD RECOVERY

C: LABORATORY CONTROL SAMPLE - NOT APPLICABLE

D: SAMPLE DUPLICATE ANALYSIS

		Α		В		С	
		METHOD	METHOD STANDARD		LABORATORY CONTROL SAMPLE		
(<u> </u>	BLANK	RECOVERY	CONTROL LIMIT	Found	Control limit	
	COMPOUND	MG/L	%	%	MG/L	MG/L	
	TPH	<2.5	95.5	NDY	-	-	
				-			
	A			·			
						······································	
			-				

D			
DUPLICATE SAMPLE Performed on 14695			TER
	RUN 1	Run 2	RPD
	MG/L	MG/L	*
TPH	57.7	55.0	4.8
			_
	CONTROL	LIMIT	20

NOTE:

NDY = NOT DETERMINED YET

SAMPLE PREPARATION:

ANALYST:

SUPERVISING CHEMIST

tauna Corctsky
caina goretsky

DATE

FAINA GODETSKY

DATE

RUSS CHIN

DATE

QUALITY CONTROL (QC) REPORT DEPARTMENT OF TOXIC SUBSTANCES CONTROL HAZARDOUS MATERIALS LABORATORY - SOUTHERN CALIFORNIA 1449 WEST TEMPLE STREET, LOS ANGELES, CA., 90026 TELEPHONE (213) 580-5795

PAGE 2 OF 2

COLLECTOR'S NAME :LARRY STUCK

DATE SAMPLE RECEIVED:04/25/95

SAMPLING LOCATION: VANDENBERG AFB 806 13TH STREET, SUITE J

DATE SAMPLE PREPARED:05/03/95 - 05/04/95

VANDENBERG AFB 93437.

DATE SAMPLE ANALYZED:05/05/95 - 05/05/95

ANALYTICAL PROCEDURES USED: SCL METHOD 418 TPH ANALYSIS BY IR

ANALYTICAL BATCH LAB ID NO.: SCL 14695,14696

QC REPORT FOR

MATRIX SPIKE(MS)/MATRIX SPIKE DUPLICATE(MSD) PERCENT RECOVERY

		AMOUNT	MATRIX SPIKE		MATRIX SPIKE DUPLICATE		AVE	CONTROL	R % D	CONTROL
MPOUND	ANALYTE IN SAMPLE	ANALYTE ADDED	AMOUNT RECOVERED	% REC	AMOUNT RECOVERED	% REC	% REC	LIMIITS FOR % REC	BETWEEN MS/MSD %	FOR RPD
	MG/L	MG/L	MG/L	*	MG/L	×	*			
TOTAL PETROLEUM HYDROCARBONS	47.0	80.0	131	104	125	96.4	100	NDY	7.6	0 - 20
								1		
				ļ						
		<u> </u>								
TE: NDY = NOT DETERMINED YET										
10 miles 2 mil			~						· · · · · · · · · · · · · · · · · · ·	

Tiered Permitting Checklist - 2 pages.

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2-700 Heinz Avenue Berkeley, CA 94710



CHECKLIST AND INITIAL VERIFICATION INSPECTION REPORT FOR Permit by Rule, Conditionally Authorized, and Conditionally Exempt Notifiers

FACIL	ITY N	AME: Vandenber	g Air Force:	Base	EPA ID NU	MBER: <u>CA</u> 957	10025149
		ADDRESS:	1 . 5	Ad al -	L DITONES		
		ONTACT-NAME:_	Louis D. Van	Mullem Co	PHONE:	acc TOCAT #	<u>-</u>
SIC C	DDE(S):	INSPECTIC	N DATE:	4pmil 19-24, 1	995_LOCAL#_	
		INIT COUNT:	PBR PBR	CA 15 CA 16	CESW 3	CESQT	TOTAL
used for t	g tier. Th hose requ	cklist and inspection report ic is inspection verifies the info irements. A checkmark indi Safety Code (HSC) and Title	rmation provided or cates violation of th	n form 1772. It s e law, which are	lso covers generator r explained in more det	equirements, although a	a separate checklist may b
		andards:					
	Each in	spection agency may use	their own gener	ator inspection	checklist or proto	cols, which are sum	marized below. A ful
	on of ea	ch item or document is r	iot conducted du	ring the Verific	ation Inspection, i	ınless serious deficie	encies are suspected.
<u>NO</u>			•	1		laces has elem	./
, 	1.	Contingency plan	nas been prepa	irea (adequa	tely minimize re	eleases, nas alarn	n/communication
	^	system, lists emerge	ency equipmen	it and phone	numbers for en	orgency coording b	aiuis). azardone masta
-	2.	Written training d Meet container ma	ocuments and	derde (store	ce time limits	oyees nanunng n	compatibility
	3.	inspected weekly, in	nagement stat	on with ign	ge ume mmis, itables/reactives	50 feet from pro	onerty line)
	4.	Meet tank manage	n good condid ment standard	c (either sec	ondary contains	nent or integrity:	assessments plus
	** .	storage time limits,	inent standard	s (Cluici sco natibility in	enected daily in	n good condition	with
		ignitables/reactives				. Bood bondidon	,
	5.	All wastes are proj	•		,.		
	<i>J</i> .	in wastes are proj	perij kaenem	` `			
Treatn	nent It	ems-Facility Wide:	(Facility must su	ıbmit a revised	Form 1772 to cor	rect errors or omiss	ions.)
X	6.	All units under PB					
		units with unit shee					
	7.	All generator ident				2 is correct.	
\overline{X}	8.	The submitted plot					nits.
	9.	There are records d	ocumenting co	ompliance w	ith sewer agenc	y pretreatment s	standards and
		industrial waste disc	charge require	ments, wher	e applicable.		
For C	A or P	BR notifiers:					
	10.	The generator has a	in annual wast	te minimizat	ion certification	n. (PBR submit	with renewals.)
	Onsite	Checklist (A)		Page 1 of _	2	N	March 27, 1995

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

, REGION 2-700 Heinz Avenue Berkeley, CA 94710



CHECKLIST AND INITIAL VERIFICATION INSPECTION REPORT FOR Permit by Rule, Conditionally Authorized, and Conditionally Exempt Notifiers UNIT SHEET

Complete one unit sheet for each unit either listed in the notification or identified during the inspection.

Unit Number:Notified Tier:		Unit Name:Correct Tier: _		
		Tied Device Count: ect Device Count:	Tanks	Containers Containers
	ll Unit	S:		
<u>NO</u>		4 11 1		waterd overto
	11.	All hazardous waste		
	12.			ccurate as to the number of tank(s) or container(s). reatment volume is appropriate for the indicated tier.
	13.			is appropriate for the tier indicated.
	14. 15.			fication form are appropriate for the tier.
	15. 16.			the notification form are appropriate for the tier.
T	17.	The treatment pro	agement informati	on on the form is correct and documented for the unit.
	18.			a federal permit on the notification form is correct.
	19.			ions and a record of the dates, volumes, residual
	17.	management, and to	_	
	20.		•	le (containers-weekly and tanks-daily).
	21.			the inspections conducted.
<u> </u>	22.			ator has notified DTSC and the local agency of the
		closure.	•	
For e	ach C	A or PBR unit:		•
	23.	The generator has s	secondary contain	ment for treatment in containers.
For e	ach PI	BR unit:		
		There is a waste ar	•	
		There are waste and	_	
	26.	There is a closure	plan for the unit.	
		ents/Observations: (ait-HSC 25201(a).)	(If this is a unit that w	vas not included on the notification form, the violation is operating

Page $\frac{2}{2}$ of $\frac{2}{2}$

Onsite Checklist (B)

EPA Inspection Checklist - pages.

GENERATOR/INTERIM STATUS INSPECTION CHECKLIST

Facility Name	Vanden berg	Air Force	e Base	<u> </u>	ID No.	CA	9570025149	
Facility Address	30 SPW/E	T , 806	13th	Street,	Suite	J		
Date(s) Inspecte	d 4/19-21	/95		_ Inspected	d By Lac	7	Stuck	

All items listed below are included in the inspection, unless lined out to indicate the item was not evaluated.

INDEX

Section	Page	<u>Section</u> Property of the section of the sect	age
I. UNAUTHORIZED OPERATIONS	2	Financial Responsibility	13
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Transportation	2	V. TRANSPORTATION	14
Unauthorized Storage & Treatment			
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Personnel Training			
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Closure Activities			
Post Closure Plan	4.5		

NOTE:

- The violations cited below are from California Health and Safety Code, Sections 25100 et seq. and Title 22, California Code of Regulations.
- Check mark notes a Violation.
- Sections marked [I] apply to IS units, [G] apply to Generators, [T] apply to Transporters, [I/G] apply to IS
 and Generator activities.
- o RCRIS violation codes are given in parentheses at the end of each violation (e.g. DGS). Codes beginning with the letter D apply to IS violations; those beginning with the letter G apply to generator violations.

I. UNAUTHORIZED OPERATIONS [I/G]

Hazardous Waste Determination [G]

1_ 66262.11 Failed to determine if waste is hazardous by testing the waste or applying knowledge of characteristics or excluded from regulation. (GGR)

Identification Number [I/G]

- 2___ 66265.11 No EPA Number to treat, store, dispose, transport or transfer HW. (DGS)
- 3_ 66262.12(a) Generator treated, stored, disposed of, transported, or offered for transportation HW without receiving an identification Number. (GGR)
 - 66262.12(c) Generator offered HW to transporter or TSDF that had not received an identification Number. (GGR)

Unauthorized Disposal, Statement & Transportation

- 5___ 25189.5(a) Disposed or induced disposal of HW at unauthorized point. (DGS)
- 6_ 25189.2(a) Made false statement(s) in application, label, manifest, record, report, permit or other document. (DGS)
- 7_ 25201(a) Disposed HW without a permit or authorization. (DGS)
- 8_ 25163(a) Transported HW or transferred HW to a transporter without valid registration issued by DTSC. (GOR)
- 9 66263.23(b) Delivered HW to an unauthorized point.(GOR)

unauthorized Storage & Treatment [G]

- 10_ 25201(a) & 66262.34(c) Storage of onsite HW in tanks or containers for more than 90 days without a permit or authorization. (DGS)
- 25201(a) Storage of onsite HW in tanks exceed 5,000 gal/45,000 lb. or aggregate 50,000 gal without permit or authorization. (DGS)
- 12__ 25201(a) Storage of offsite HW in tanks or containers for any time without permit or authorization. (DGS)
- 13___ 25201(a) Storage of onsite HW in containers less than 5,000 gal and the aggregate exceeds 50,000 gal (not tanks) without permit or authorization. (DGS)
- 14___ 25201(a) Storage of HW in other than containers or tanks without permit or authorization. (DGS)
- 15__ 25201(a) & 66263.18 Storage of HW at a transfer facility greater than 144 hours without permit or authorization. (DGS)
- 16__ 25201(a) Treatment of HW without a permit or authorization. (DOR)

Part A/B of Permit Application [I]

- 17 66265.1(c) Facility failed to file Part A. (DGS)
 - 3 66265.1(c)(1) Facility managed HW not specified in Part A. (DGS)
- 19 66265.1(c)(2) Employed processes not described in Part A. (DGS)
- 20 66265.1(c)(3) Exceeded design capacities specified in Part A. (DGS)
- 21____ 66265.2 Failed to submit a request for changes in the facility to the Department and/or failed to implement the approved changes according to a schedule of compliance [see also section 66270.72]. (DGS)
- 22 66270.10(e)(2) Failed to submit Part B by required deadline. (DPB)

II. WALKTHROUGH OBSERVATIONS

Security [1] (See Guidance, Appendix "Container Management Area")

- 23 66265.14(b) Inadequate security measures at active portion of facility to control unauthorized entry. (DGS)
- 24_ 66265.14(c) Failed to post "Danger Hazardous Waste Area Unauthorized Personnel Keep Out" sign(s) at each entrance to active portions of the facility. (DGS)
- 25_ 66265.14(c) Posted sign(s) illegible at 25 feet distance and/or not written in English, Spanish and other applicable languages. (DGS)

7D Checklist 5/10/93) Rev. 8/31/94

Preparedness and Prevention [I/G] (See Guidance, Appendix: "Container Management Area")

- 26__ 66265.31 Facility not maintained or operated to minimize possibility of fire explosion, or release of HW or HW constituents to air, soil, or surface water which could threaten human health or the environment. (DCP/GOR)
- 27__ 66265.32(a) Facility not equipped with internal communications or alarm system. (DPP/GOR)
- 28___ 66265.32(b) Facility not equipped with a device (i.e. telephone or two-way radio) capable of calling outside emergency help. (DPP/GOR)
- 29_ 66265.32(c) Facility not equipped with portable fire extinguisher, fire control equipment, spill control equipment, and/or decontamination equipment. (DCP/GOR)
- 30_ 66265.32(d) Facility not equipped with water at adequate volume and pressure to supply water hose streams, foam producing equipment, or automatic sprinklers. (DCP/GOR)
- 31___ 66265.33 Failed to test and maintain all communications or alarm systems, fire protection, spill control, or decontamination equipment. (DPP/GOR)
- 32___ 66265.34 No immediate access to emergency communication and/or alarm system during HW handling. (DPP/GOR)
- 66265.35 Failed to maintain adequate aisle space. (DPP/GOR)
- 4_ 66265.37 No arrangements made with police, fire department, emergency response, local hospital, Office of Emergency Service, and/or emergency response contractors. (DPP/GOR)

<u>Use and Management of Containers [I/G]</u> (See Guidance, Appendix: "Container Violations" and "Container Management Area")

- 35_ 66265.171 Failed to transfer HW from containers not in good condition or leaking to containers in good condition. (DMC/GOR)
- 36_ 66265.172 Failed to use container or liner that was compatible with HW to be stored or transferred. (DMC/GOR)
- 37___66265.173(a) Failed to keep containers of HW closed except when adding or removing HW. (DMC/GOR)
- 38___ 66265.173(b) Handled container of HW in a manner which may cause it to rupture or leak. (DMC/GOR)
- 39_ 66265.174 Failed to inspect areas where containers are stored or transferred at least weekly, looking for leaking containers and deterioration of containers and containment system. (DGS/GOR)
- 40___ 66265.176 Failed to locate ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line. (DMC/GOR)

- 1_ 66265.177(a) Incompatible wastes or wastes and materials were placed in the same container without complying with 66265.17(b). (DMC/GOR)
- 42_ 66265.177(b) Placed HW in unwashed container that previously held incompatible waste or material. (DMC/GOR)
- 43_ 66265.177(c) Container of HW which was incompatible with any other waste or material stored nearby in other containers, tanks, waste piles, or surface impoundments was not separated or protected by a berm or other device. (DMC/GOR)

Pre-Transport Requirements [G] (See Guidance, Appendix: "Container Violations")

- 44_ 66262.30 Failed to package HW per DOT (49 CFR Parts 173, 178, 179) before offering HW for transportation offsite. (GPT)
- 45_ 66262.31 Failed to label each package of HW per DOT (49 CFR Part 172) before offering HW for transportation offsite. (GPT)
- 46_ 66262.32 Failed to mark each package of HW with shipping name, ID#, ORM designation (label <110 gal) per DOT (49 CFR Part 172) before offering HW for transportation offsite. (GPT)
- 47_ 66262.33 Failed to ensure the transport vehicle is correctly placarded per DOT (49 CFR Part 172, Subpart F) for hazardous materials before offering HW for transportation offsite. (GPT)
- 8_ 66262.34(e)(1) Accumulated HW in containers at point of generation (e.g. satellite accumulation area) beyond quantity or time limits. (GPT)
- 49___ 66262.34(e)(3) Failed to mark container of HW at point of generation (i.e. satellite accumulation area) with the date quantity limit reached, within 3 days of reaching the limit. (GPT)
- 50___ 66262.34(f)(1) Failed to mark accumulation start on each container on each container and <u>portable</u> tank in the 90-day accumulation area. (GPT)
- 51____ 66262.34(f)(2) Failed to mark the 90 days accumulation date period begins for each container and tank.
- 52 × 66262.34(f)(3) Failed to label each container and tank of HW with words "Hazardous Waste". (GPT)
- 53 66262.34(f)(3) Failed to label containers and portable tanks of HW with composition and physical state of HW, hazardous properties, and name and address of generator. (GPT)

Contaminated Containers [G] (See Guidance, section XVIII)

- 54_ 66261.7(f) Container or inner liner > 5 gal. not marked with date emptied and managed pursuant to 66261.7(e) within one year of date emptied. (GOR)
- 55_ 66261.7(p) Containers or inner liners of containers containing HW which are not "empty" per 66261.7(b) or (d) are not managed as HW. (GOR)
 - D Checklist 5/10/93) Rev. 8/31/94

Tanks [I/G] (See Guidance, section VII)

Existing systems (installed before 7/14/86):

- 56_ 66265.191(a) Failed to determine whether tank is leaking or unfit and keep written integrity assessment certified by registered professional engineer for tanks without secondary containment. (DTR/GOR)
- 57_ 66265.191(b) Assessment failed to determine whether tank system is adequately designed, of sufficient structural strength, and compatible with HW. (DTR/GOR)
- 58__ 66265.191(d) If found to be leaking or unfit for use, failed to comply with 66265.196. (DTR/GOR)

New tank systems (installed after 7/14/86):

59_ 66265.192 Failed to obtain or retain onsite the required written assessment and certification statements for design and installation of new tank systems. (DTR/GOR)

Requirements for all Tank systems:

- 60_ 66265.193 Failed to provide required secondary containment. [refer to guidance document for compliance dates] (DTR/GOR)
- 61_ 66265.194(a) Placed HW or treatment reagents in tank system which caused the tank, containment system or ancillary equipment to leak, corrode, rupture, or fail. (DTR/GOR)
- 2__ 66265.194(b) Failed to use controls and practices to prevent spillage and overflows from tank system. (DTR/GOR)
- 63_ 66265.194(b)(3) Failed to maintain sufficient freeboard (60 cm/2 ft) in uncovered tanks to prevent overtopping. (DTR/GOR)
- 64_ 66265.195(a) Failed to conduct daily inspection of tanks for following: discharge control equipment, corrosion, releases, monitoring and leak detection data, construction materials and secondary containment areas, and level of waste in uncovered tanks. (DTR/GOR)
- 65_ 66265.195(b) Failed to inspect cathodic protection systems (if present) and sources of impressed current as appropriate. (DTR/GOR)
- 66 66265.195(c) Failed to maintain results of tank inspections in the operating record (ISD only). (DTR)
- 67_ 66265.196 Failed to remove from service immediately a tank system or secondary containment system that had leaked or spilled. (DTR/GOR)
- 68_ 66265.197(a) During closure of tank system, failed to remove or decontaminate all waste residues, contaminated tank system, soils and structures; and failed to manage them as HW. (DTR/GOR)
- 69_ 66265.197(c) When facility closed a tank system that lacked required secondary containment, they failed to include closure and contingent post-closure plans (ISD only). (DTR)

- 66265.198(a) Stored or treated ignitable or reactive waste in tanks so as to cause the waste to ignite or react. (DTR/GOR)
- 71_ 66265.198(b) Failed to comply with buffer zone requirements for tanks containing ignitable or reactive wastes per NFPA "Flammable and Combustible Liquids Code." (DTR/GOR)
- 72__ 66265.199(a) Stored incompatible wastes in same tank without complying with 66265.17(b). (DTR/GOR)
- 73_ 66265.199(b) Placed HW in non-decontaminated tanks that previously held an incompatible waste or material without complying with 66265.17(b). (DTR/GOR)
- 74_ 66265.200(a) Failed to conduct waste analysis and bench scale tests or obtain appropriate documented information on similar waste before tank system is used to treat or store HW substantially different.—(DTR/GOR)

Ignitable, Reactive, or Incompatible Wastes [I]

This section applies to containers, tanks, waste piles, surface impoundments where ignitable, reactive or incompatible wastes stored, treated, or disposed.

- 75__ 66265.17(a) Failed to take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. (DGS)
- 66265.17(a) Ignitable or reactive waste was not separated and protected from sources of ignition or reaction. (DGS)
- 77___ 66265.17(a) Failed to place "No Smoking" signs wherever hazard from ignitable or reactive waste. (DGS)

NOTE: The following requirement applies to generators per 66265.177(a) for containers and 66265.199(a)&(b) for tanks.

- 78___ 66265.17(b) Failed to conduct transfer, storage, treatment, or disposal of ignitable or reactive wastes or the mixture or commingling of incompatible wastes and/or materials to prevent:
 - (1) Generation of extreme heat or pressure, fire or explosion, or violent reaction.
 - (2) Production of uncontrolled toxic mists, fumes, dusts or gases to threaten human health or environment.
 - ____ (3) Production of uncontrolled flammable fumes or gases to pose risk of fire or explosions.
 - _____ (4) Damage to structural integrity of HW containment devices.
 - (5) Threat to human health or the environment. (DGS/GOR)
- 79_ 66265.17(c) Failed to document compliance based on literature, trial tests, waste analyses, or similar treatment. (DGS)

Recyclable Materials [I/G] (See Guidance, section II)

- 80___ 66266.81(b) Damaged lead acid batteries not properly managed and labelled. (DOR/GOR)
- 81_ 66266.120(a)(3) Accepted > 10 lb. elemental mercury from offsite without a manifest or from registered hauler. (DOR)

Used Oil [I/G] (See Guidance, section II)

- 82_ 25250.5(a) Disposed of used oil by discharge to sewers, drainage systems, water, incineration, or burning as fuel, or disposal on land without authorization. (DOR/GOR)
- 83__ 25250.5(b) Used Oil, recycled oil, or oil exempt was used as dust suppressant and failed to meet applicable standards. (DOR/GOR)
- 84_ 25250.7 Intentionally contaminated used oil with other hazardous waste, other than small amounts of vehicle fuel. (DOR/GOR)
- 85_ 66266.130(c)(6) Failed to manage used oil separated from used oil filters during drainage processes as HW. (DOR/GOR)

I. DOCUMENT REVIEW

Manifest System [G] (See Guidance, Appendix: "Manifest Violations")

- 86 66262.20(a) Failed to prepare a complete manifest for HW transported or sent offsite. (GMR)
- 87 66262.20(b) Failed to designate on the manifest a facility which is authorized to handle the HW. (GMR)
- 88____66262.23(a)(1)(2) Applicable manifest section not properly completed, signed or dated. (GMR)
- 89_ 66262.23(a)(4) Generator manifest copies not sent to Department within 30 days of each shipment of HW. (GMR)
- 90 66262.23(b) Failed to give manifest copies to transporter. (GMR)
- 25160(b)(3) For out-of-state shipments, failed to submit TSDF manifest to the Department signed by all transporters (except rail transporters) and out-of-state facility operator within 30 days. (GMR)
- 92_ 66262.42(a) Failed to determine the status of HW when generator did not receive facility manifest copy within 35 days. (GRR)
- 93 66262.42(b) Exception Report not sent to Department within 45 days. (GRR)
- 94 66262.40(a) Failed to keep signed copy of manifest for 3 years. (GRR)

66263.42(e) Generators failed to keep shipping papers or receipt for milkrun operations for 3 years. (GRR) 66266.81(a)(4)(B) Failed to retain copy of manifest or bill of lading for spent lead acid batteries for 3 96 years. (GRR) 25250.8(b)(3) Failed to retain copies of used oil receipts for 3 years. (GRR) 97 98 66266.130(c)(5) Failed to keep bill of lading for used oil filters for 3 years. (GRR) Manifest System [I] (See Guidance, Appendix: "Manifest Violations") 99 66265.71(a)(1) Failed to sign and date copy of manifest for HW received from offsite. (DMR) 100_ 66265.71(a)(2) Failed to note significant discrepancies in the manifest. (DMR) 101 66265.71(a)(3) Failed to give copy of signed manifest to transporter. (DMR) 102_ 66265.71(a)(4)(5) Failed to send copy of manifest to the Department and generator within 30 days. (DMR) 103 66265.71(a)(6) Failed to retain copy of each manifest for at least 3 years. (DMR) 66266.81(a)(6)(B) Failed to retain copy of manifest or bill of lading for spent lead acid batteries for 3 vears. (DMR) 66265.71(b)(1-6) Failed to sign and date shipping paper or manifest from rail or water shipment, submit copies, retain copies, and/or note discrepancies in manifest. (DMR) 66265.72(b) If discrepancy is not resolved within 15 days after receiving waste, failed to submit a letter to the Department. (DMR) 66265.76 Failed to submit unmanifested waste report to the Department within 15 days after receiving the waste from offsite. (DMR)

Land Disposal Restrictions (LDR) [G] (See Guidance, section VIII)

108_ 66268.7(a) No determination whether waste is restricted from land disposal. (GLB)

109_ 66268.7(a)(1) No notification for LDR waste that fails to meet all applicable treatment standards. (GLB)

NOTE: The notification must include the following:

- EPA HW Number, or California Waste Code and Non-RCRA HW (see 66268.29 for list of non-RCRA waste types)
- corresponding treatment standards or treatment technologies
- c. manifest number associated with the waste shipment
- d. waste analysis data, where available.

- 110__ 66268.7(a)(2) Failed to submit a signed notice and certification for LDR waste which does not require further treatment. (GLB)
- 111_ 66268.7(a)(3) Failed to submit a notification that waste is subject to an exemption to the receiving facility. (GLB)
- 112__ 66268.7(a)(5) Failed to retain onsite determination/waste analysis records. (GLB)
- 113_ 66268.7(a)(6) Failed to retain notifications, certifications, other records for 5 years. (GLB)

Land Disposal Restrictions (LDR) [I] (See Guidance, section VIII)

- 114_ 66268.7(b) Failed to test waste according to WAP for LDR. (DLB)
- 115__ 66268.7(b)(4) Failed to send notice with each waste shipment to land disposal facility. (DLB)
- 116___ 66268.7(b)(5) When applicable, failed to submit certification with each shipment of waste or treatment residue of restricted waste to land disposal facility. (DLB)
- 117___ 66268.7(b)(6) TSDF failed to comply with notice and certification (when applicable) for waste or treatment residue which will be further managed at different treatment or storage facility. (DLB)
- 118_ 66268.7(c)(1) Land disposal facility failed to keep copies of notice and certification and test waste to assure waste or treatment residues are in compliance with treatment standards and prohibitions. (DLB)
- 119___ 66268.7(c)(2) Land disposal facility failed to test waste or treatment residue according to facility's WAP.
 (DLB)

Exports of Hazardous Waste [G] (See Guidance, section IX)

- 120_ 66262.52 Exports of HW prohibited without notification of intent to export, consent of receiving country, and EPA Acknowledgement of Consent. (GCS)
- 121___ 66262.53(b) Exporter of Non-RCRA HW fail to notify Department of intended export 4 weeks prior to shipment. (GCS)
- 122__ 66262.54 Exporter failed to comply with special manifest requirements. (GCS)

Recordkeeping and Reporting [G]

- 123___ 66262.40(c) Waste analysis/test records not kept for at least 3 years. (GRR)
- 124__ 66262.41(a) Biennial Report not sent to the Department by March 1st of even numbered years. (GRR)
- 125 66262.40(b) Copy of Biennial Report / Exception Report not retained for 3 years. (GRR)
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cordkeeping and Reporting [I/G] (See Guidance, sections IX and X)

- 126_ 66265.12(a) Failed to notify the Department at least four weeks in advance of the arrival of initial load of HW from a foreign source. (DGS)
- 127__ 66265.12(b) Failed to inform generator in writing that the facility is authorized to receive HW and/or failed to keep a copy of this notice in the operating record. (DGS)
- 128_ 66265.12(c)(1) Failed to notify the new owner or operator of the facility in writing of requirements of Chapter 15 and Chapter 20 of Title 22. (DGS)
- 129_ 66265.73(a) Failed to keep written operating record onsite. (DMR)
- 130_ 66265.73(b) Failed to record all information and maintain operating record until closure of facility. (DMR)
- 131___ 66265.74(a) Failed to furnish all records and plans upon request. (DMR)
- 132_ 66265.75 Failed to prepare and submit copies of annual report to the Department by March 1 of each year. {Note: for 1992 report keep onsite not submit to Department} (DMR)
- 133__ 66265.75 Annual report lacked all required information. (DMR)
- 134_ 66265.77(a) Failed to report releases, fires, and explosions to the Department within 15 days per 66265.56(j). (DMR)
- 35_ 66265.77(b), 66265.93 & 66265.94 Failed to report to the Department ground-water contamination and monitoring data.

Contingency Plan and Emergency Procedures [I/G] (See Guidance, section XI)

- 136__ 66265.51(a) No contingency plan. (DCP/GOR)
- 137_ 66265.51(b) Failure to implement contingency plan whenever there is a fire, explosion, or release of HW which could threaten human health or environment. (DCP/GOR)
- 138 66265.52 Incomplete contingency plan. (DCP/GOR)
- 139___ 66265.53(a) Contingency plan not maintained on site. (DCP/GOR)
- 140__ 66265.53(b) Contingency plan not submitted to local emergency authorities. (DCP/GOR)
- 141 66265.54 Contingency plan not amended as necessary. (DCP/GOR)
- 142___ 66265.55 No emergency coordinator either on premises or on-call at all times. (DCP/GOR)
- 143__ 66265.56 Emergency coordinator failed to implement the emergency procedures immediately in an inminrntemergency situation. (DCP/GOR)
- 144_ 66265.56(j) Facility failed to note required information in operating log and submit written report to the Department within 15 days. (DCP/GOR)
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General Inspection Requirements [I] (See Guidance, section XII)

- 145_ 66265.15(b)(1) Failed to develop and follow inspection schedule. (DGS)
- 146_ 66265.15(b)(2) Failed to keep a copy of the inspection schedule. (DGS)
- 147_ 66265.15(b)(3) Inspection schedule failed to identify appropriate problems to be looked for. (DGS)
- 148_ 66265.15(c) Failed to record all the required information revealed during inspection. (DGS)
- 149__ 66265.15(d) Failed to record all the required information in the inspection schedule. (DGS)
- 150__ 66265.15(d) Failed to keep the complete inspection records for 3 years. (DGS)

Personnel Training [I/G] (See Guidance, section XIII)

- 151__ 66265.16(a)(1) Personnel failed to complete training course to assure compliance with HW requirements. (DGS/GOR)
- 152__ 66265.16(a)(2) Training program was not directed by a person trained in HW procedures and/or not relevant to employees' job duties. (DGS/GOR)
- 66265.16(a)(3) Training program failed to ensure that facility personnel are able to respond to emergencies. (DGS/GOR)
- 154_ 66265.16(b) Personnel failed to complete the required training program within 6 months of employment or worked in unsupervised positions prior to completing the required training. (DGS/GOR)
- 155 66265.16(c) Personnel failed to receive an annual review of their initial training. (DGS/GOR)
- 156 66265.16(d) Failed to maintain all the required training documentation onsite. (DGS/GOR)
- 157__ 66265.16(e) Failed to keep training records on current personnel and/or former employees within the last 3 years onsite. (DGS/GOR)

Waste Analysis Plan (WAP) [I] (See Guidance, section XIV) -

- 158__ 66265.13(a) Failed to obtain detailed waste analyses. (DGS)
- 159 66265.13(b) No written WAP. (DGS)
- 160 66265.13(b) Written WAP not kept at the facility. (DGS)
- 161 66265.13(b) Failed to follow WAP. (DGS)
- 162 66265.13(b) WAP was incomplete. (DGS)
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WAP	for OffSite Facilities III				
163_	66265.13(b)(5) WAP did not specify the generator's waste analyses. (DGS)				
164_	66265.13(b)(6) WAP did not contain methods to be used to meet additional requirements for:				
	Tanks (66265.198 & .200) Incinerators (66265.341) Waste Piles (66265.252) Land Treatment (66265.273) Land Disposal Restrictions (66268.7) (DGS) Liquids in landfills (66265.314) Surface Impoundments (66265.225) Thermal Treatment (66265.375) Other Treatment (66265.402)				
165	_ 66265.13(c) WAP did not describe procedures to inspect or analyze waste to ensure it matches identity of waste on manifest. (DGS)				
166	66265.13(c)(1) WAP did not describe the procedures for identifying movement of each HW. (DGS)				
167_	66265.13(c)(2) WAP did not describe sampling methods. (DGS)				
Closur	e Plan [I] (See Guidance, section XV)				
168_	66265.112(a) No written Closure Plan kept onsite. (DCL)				
99_	66265.112(b) Closure Plan incomplete. (DCL)				
170	_ 66265.112(c) Closure Plan not updated when required. (DCL)				
171	66265.112(c) Changes to approved closure plan not submitted to the Department for authorization. (DCL)				
172	66265.112(d)(1) Failed to submit unapproved closure plan at least 180 days prior to beginning closure of surface impoundment, waste pile, land treatment or landfill unit, or final closure of such unit. (DCL)				
173	66265.112(d)(1) Failed to submit unapproved closure plan at least 180 days prior to beginning final closure of tanks or containers or incinerator units. (DCL)				
174	66265.112(d)(1) Facility with approved closure plans failed to notify Department in writing at least 60 days prior to beginning closure of surface impoundments, waste pile, landfill, or land treatment unit, or final closure of facility with such unit. (DCL)				
175	66265.112(d)(1) Facility with approved closure plan failed to notify the Department in writing at least 45 days prior to beginning final closure of tanks or containers or incinerator units. (DCL)				
76	66265.112 (d)(3)(A) Failed to submit the closure plan to the Department within 15 days after termination				

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Closur	re Activities [I]			
177	_ 66265.113(a) Within 90 days after receiving final HW or approval of closure plan whichever is later, facility failed to treat, remove, or dispose onsite all HW in accordance with approved closure plan. (DCL)			
178	66265.113(b) Failed to complete partial or final closure according to closure schedule and within 180 days after receipt of final HW or approval of closure plan whichever is later. (DCL)			
179_	66265.114 Equipment, structures or contaminated s	oils not properly disposed or decontaminated. (DCL)		
180	_ 66265.115 Failed to submit certification of closure to the Department within 60 days after completion of closure of each HW surface impoundment, waste pile, land treatment, and landfill unit, or within 60 days of final closure. (DCL)			
Post C	Closure Plan [I] (See Guidence, section XV)			
	Applies to HW disposal facilities (landfills, surface impremoved during closure.	poundments, waste piles) where all HW will not be		
181	66265.117(b)(1) Failed to conduct post-closure care for each HW management unit for 30 years. (DCL)			
182	66265.117(c)(1) Failed to provide security per 6626	5.14 during post-closure period. (DCL)		
33_	66265.117(d) Unauthorized disturbance of final cover or the monitoring system. (DCL)	r, liner(s), other components of containment system,		
184	_ 66265.117(e) Failed to follow post-closure plan. (DCL)			
185	_ 66265.118(a) No written Post Closure Plan. (DCL)			
186_	_ 66265.118(b) Failed to keep the post-closure plan onsite. (DCL)			
187	_ 66265.118(c) Post Closure Plan incomplete. (DCL)			
188_	66265.118(d) Post Closure Plan not amended as required. (DCL)			
189	66265.119(a) Failed to submit required post-closure notices within 60 days of certification of closure. (DCL)			
190	66265.119(c) Failed to request modification to approved post-closure plan prior to removing hazardous waste, residue, liner, or contaminated structures and equipment. (DCL)			
191	66265.120 Failed to submit certification of post-closure completion within 60 days. (DCL)			
192	Failed to follow special requirements during post-clos Surface Impoundments [66265.228(b)] Waste Piles [66265.258(b)]	ure period for: Tanks [66265.197(c)] Land Treatment (66265.280(c)&(f))		

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Waste Piles [66265.258(b)] Landfills [66265.310(e)]. (DCL)

Financial Responsibility [1] (See Guidance, section XIX)

- 193__ 66265.142(a) Failed to prepare proper written closure cost estimate of all closure activities. (DFR)
- 194_ 66265.142(b) Failed to adjust closure cost estimate for inflation. (DFR)
- 195_ 66265.142(c) Failed to revise closure cost estimate within 30 days after modifying closure plan. (DFR)
- 196 66265.142(d) Failed to keep latest closure cost estimate onsite. (DFR)
- 197__ 66265.143 Failed to establish or demonstrate financial assurances for closure of the facility. (DFR)
- 198___66265.143 Failed to amend financial assurance mechanism to cover revised closure cost estimate. (DFR)
- 199_ 66265.144(a) Failed to prepare proper written post-closure cost estimate of all post-closure activities.
 (DFR)
- 200_ 66265.144(b) Failed to adjust post-closure cost estimate for inflation. (DFR)
- 201___ 66265.144(c) Failed to revise post-closure cost estimate within 30 days after modifying post-closure plan. (DFR)
- 202_ 66265.144(d) Failed to keep latest post-closure cost estimate onsite. (DFR)
 - 66265.145 Failed to establish or demonstrate an appropriate financial assurance mechanism to cover the cost of post-closure care. (DFR)
- 204__ 66265.145 Failed to amend financial assurance mechanism as needed to cover revised post-closure cost estimate. (DFR)
- 205_ 66265.147(a) Failed to demonstrate liability coverage for sudden accidental occurrences of at least \$1 million per occurrence with annual aggregate of at least \$2 million per year per facility. (DFR)
- 206_ 66265.147(b) Disposal facility failed to demonstrate liability coverage for non-sudden accidental occurrences of at least \$3 million per occurrence with annual aggregate of at least \$6 million per year per facility. (DFR)

IV. SOURCE REDUCTION

- 207___ 25244.15(d), 25244.19 through 25244.21 Generator was subject to SB 14 or SB 1726 and failed to prepare and retain current source reduction documents as applicable and make them available to the inspector within five days.
- 208_ 67100.5 Source Reduction Evaluation Review and Plan (aka Source Reduction Plan, or Plan) failed to contain required elements, such as certification, amounts of wastes generated, process description, block diagrams, and implementation schedule of selected source reduction measures.
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INTERAGENCY REFERRAL

An inspection was made by a representative of this Department on the date and at the location indicated below. During the course of our inspection, the following conditions were noted which your Board / Department / Agency may wish to investigate.

Complete address:		
Telephone number: Attention:		
Please advise o	f your disposition of this matter	,
LOCATION / FACILITY		
Facility / owner's nam Complete address:	e:	
Telephone number: Occupant's name:		
Occupant's name: Permit / identification	number (e.g., EPA generator ID, wastewate	
Occupant's name: Permit / identification permit, etc.), if availab Inspector:	ole:Telephone number:	
Occupant's name: Permit / identification permit, etc.), if available inspector: Inspection date:	Telephone number: Referral date:	
Occupant's name: Permit / identification permit, etc.), if available inspector: Inspection date:	Telephone number: Referral date:	
Occupant's name: Permit / identification permit, etc.), if available inspector: Inspection date:	Telephone number: Referral date:	
Occupant's name: Permit / identification permit, etc.), if available inspector: Inspection date:	Telephone number: Referral date:	
Occupant's name: Permit / identification permit, etc.), if available inspector: Inspection date:	Telephone number: Referral date:	

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Tel. (213) 266-7510

Fax (213) 266-7600

Laboran Region (6) 2092 South Lake Tahoe Bivd., Sec. 2 South Lake Tahoe, CA 96150 Tel. (916) 544-3481 Fax. (916) 544-2271

Colorado River Basin Region (7) 73-720 Fred Waring Drive, Ste. 100 Paim Desert, CA 92260 Tel. (619) 346-7491

Fax (619) 341-6820

Santa Am Region (8) 2010 Iowa Avenue, Suc. 100 Riverside, CA 92507-2409 Tel. (909) 782-4140 Fax (909) 781-6288 San Diego Region (9) 9771 Clairemort Mesa Blvd., Sac. B San Diego, CA 92124 Tel. (619) 467-2952 Fax (619) 571-6972

Department of Toxic Substances Control 400 P Street, 4th Floor Sacramento, CA 95812

> Criminal Investigations Branch Tel. (916) 324-2448 Fax (916) 323-5542

Surveillance and Enforcement Branches:

Region I (Sacramento) 10151 Croydon Way, Ste. 3 Sacramento, CA 95827-2106 Tel. (916) 255-3549 Fax (916) 255-3595 Region 2 (Berkeley) 700 Heinz Street, Bldg. F Berkeley, CA 94710 Tel. (510) 540-3860 Fax (510) 540-5907

Region 3 (Giendale) 1011 N. Grandview Avenue Glendale, CA 91201 Tel. (818) 551-2800 Fax (818) 551-2901 Region 4 (Long Beach) 245 W. Broadway, Stc. 350 Long Beach, CA 90802 Tel. (310) 590-5950 Fax (310) 590-5907

TOXICS HOTLINE: 1-800-69-TOXIC

Department of Pesticide Regulation Pesticide Enforcement Branch 1220 N Street Sacramento, CA 95814 Tel. (916) 654-0831 Faz. (916) 654-1427

Field	Officer

"Anheim (714) 680-7903 Berkeley (\$10) 540-2910

(209) 445-5401

Sacramento 1 (916) 445-6983

Office of Health Hazard Assessment 601 N. 7th Street Sacramenso, CA 94234-7320 Tel. (916) 324-7572 Fax (916) 327-1097

Prosecutors (e.g., U.S. Attorney, Amoraey General, City / District Attorney, etc.)

Other Federal / State / Local Enforcement Agencies (e.g., FBI, EPA, CHP, air district, county health, etc.)